

RECEIVED FEB 23 1993

WMD RCRA
RECORD CENTERIllinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA # IL 1991 0006271696 IEPA #: 1190200002

Facility Name: East Allen / Ohio Corp - MAIN Plant Phone #: 618-258-5038

Street Address: 427 N. Shamrock Street County: Madison

City: East Allen State: IL Zip: 62024

Region: 6 Inspection Date: 11-13-91 and 11-15-91 From: 9:35-9:50 To: 3:30-11:30 AM

Weather: Cool 60°

TYPE OF FACILITY

Notified As: G/T/TSD Regulated As: G/T/TSD

LDF? yes HPV? no 90-Day F/U Required?: YES X NO

TYPE OF INSPECTION

CEI: X Sampling: Citizen Complaint: Closed:

CME/O&M: Record Review: Follow-Up to Inspection of:

US EPA RECORDS CENTER REGION 5



1001732

NON-REGULATED STATUS

SQG: Claimed Nonhandler: Other (Specify in Narrative):

PART A

Notification Date: 08/18/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: 11/10/90 (TCLP)

Part A Withdrawal requested: / / Approved by (US)(IL) EPA: / /

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 11/06/90 Final Permit Issued: 04/02/90

ZONE 3 Incineration **ENFORCEMENT** FOR site 4-2a container storage only

Has the firm been referred to -- USEPA: Y or N / /

Illinois Attorney General: Y or N / / County State's Attorney: Y or N / /

ORDERS ISSUED

CACO: / / CAFO: / / Consent Decree: / /

Federal Court Order: / / State Court Order: / / IPCB Order: RECEIVED

TSD FACILITY ACTIVITY SUMMARY

25 NOV 1991

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp?	Exempt per 35 IAC, Sec.	IEPA/DLPC On Annual Report		
							1988	1989	1990
S01	Yes	N/A	Yes	NO*	Yes	NO	Yes	Yes	Yes
T01	Yes	N/A	Yes	NO*	Yes	Land Exempt pursuant to 725.101(c)(2)	Yes	Yes	N/A
S03	Yes	N/A	Yes	Pursuing Closure	NO	NO	not used since 1981-82		
S04	Yes	N/A	Yes	Pursuing Extended Closure	NO	NO	not used since 1987		
T03	Yes	N/A	Yes	NO	Yes	NO	Yes	Yes	Yes
T04	Yes	N/A	Yes	N/A	Yes	Yes waste Reclassified as non-hazardous		N/A	N/A

* Some of these units going through closure

OWNER**OPERATOR**

Name <i>Olin Corporation</i>	Name <i>SAME</i>
Address <i>427 N. Shamrock St.</i>	Address
City <i>East Alton</i>	City
State <i>Illinois</i> Zip <i>62024</i>	State Zip
Phone # <i>618-258-5038</i>	Phone #

PERSON(S) INTERVIEWED**TITLE****PHONE #**

<i>Robert C. Kaempe</i>	<i>Environmental Engineer</i>	<i>618-258-5712</i>
<i>Louis W. Pattan</i>	<i>Sr. Engineering Technician</i>	<i>618-258-5728</i>

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

<i>Mike Grant</i>	<i>IEPA/FOS</i>	<i>618-346-5120</i>
<i>Chris Cahnovsky</i>	<i>IEPA/FOS</i>	<i>618-346-5120</i>

PREPARED BY**AGENCY/TITLE****PHONE #**

<i>Chris Cahnovsky</i>	<i>IEPA/FOS</i>	<i>618-346-5120</i>
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SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
OTH	I	703.121 a) 2)
<i>specifically</i>	<i>PART</i>	<i>B permit Section II 6) 2)</i>
LDR	II	728.107 a) 6)
LDR	I	728.150 c)

Area	Class	Section

Area	Class	Section

Facility Name: Olin Corporation - Main Plant
 USEPA #: IL 0006271696
 IEPA #: 1190200002

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19	* 19	* 19					
WWT Sludge	Winchester WWT at Zone 6	2/12/91	FC06 DC05 K046	Y	Y	G	G	G	45 yds	~16 yd ³ /wk	9-18-91	Peoria Disposal Co Heritage
Bag house Dust	All Baghouse Units	2/26/91	DC08	Y	Y	G	G	G	2 yd ³	1 yd/day	5-14-91	Heritage → Also used AS lime slurry substitute at Zone 6 WWT
Plating Waste	Site 1-1 Bullet Plating	3/25/91	FC07 FC08 FC09	Y	Y	G	G	G	110 gal	~5000 gal/yr	6-20-91	Cyanotech - Detroit Mich. Also - Discharged to Zone 6 WWT.
Incinerator Ash	Zone 3 Incinerator	1-23-91	DC08	Y	Y	G	G	G	60 yd ³	~2000 yd ³ /yr	11-11-91	Peoria Disposal Peoria
Tumbling media	Lead Cont. waste from Bullet Burnishing	7-12-91	DC08	Y	Y	G	G	G	14 (10 yd) boxes	~400 yd ³ /yr	9-23-91	Peoria Disposal General Battery Reading PA (Recycler)
Spent Solvent	Cleaning, Cutting Degreasing	2-25-91	FC01 FC02	Y	Y	G	G	G	300 gal chlorinated 550 gal nonchlor.	~5000 gal/yr	10-1-91	Safety-Kleen New Castle, Ky.
Ballistic Sand	Sand Cont. lead from firing range	2-18-91	DC08	Y	Y	G	G	G	-0-	~220 yd ³ /yr	1-23-91	Peoria Disposal General Battery Reading PA.
Mercury Cont. Ammo & Debris	QA/QC of Ammo (DCD) Requirement	7/12/91	DC09	Y	Y	G	G	G	4.5 gal boxes	~275 gal/yr	10-9-91	TWI
Waste petroleum Naptha	Safety-Kleen PARTS WASHERS	Supplied by S-K	DC01	Y	Y	G	G	G	N/A	4,000 gal/yr	10-16-91	Safety-Kleen
Lead Cont. SCRAP	wads, shots, debris	5/23/91	DC08	Y	Y	G	G	G	1-cyd		10/1/91	Emelle

* All "NO" responses must be explained in narrative.

REMARKS

Refer to: 1190200002 - Madison County
East Alton/Olin Corp. Main Plant
ILD006271696

Olin Corporation, located in East Alton, Illinois, has two manufacturing facilities referred to as the Winchester Group and the Brass Group. Small arms ammunition, primer explosives, and other ammunition related products are manufactured by the Winchester Group. The Brass Group manufactures copper base alloy products. Regulated hazardous waste activities at this facility included storage in drums (S01), storage and treatment in tanks (S02, T01), storage in surface impoundment (S04), incineration (T03), and treatment in other devices (T04), i.e., hammermills and rotary destruct furnace. Types of waste generated are lead contaminated filters and baghouse dust, plating waste, explosive wastes, waste water treatment sludge, scrap ammo, incinerator ash, and spent solvents.

On April 2, 1990, a Part B permit was issued to Olin for container storage of mercury contaminated ammo at Site 4-2(a). This permit became effective on May 5, 1991 and was revised April 22, 1991. The revision was made to include the storage of mercury contaminated debris. This permit stated that a container storage area was to be constructed at Site 4-2(a). This structure was put in to service on September 26, 1991, and was in use at the time of the November 13, 1991 inspection.

On November 13, 1991, Chris Cahnovsky and Mike Grant (IEPA) conducted an inspection at Olin Corporation's Main Plant. Also present during this inspection were Robert Kaempfe, Environmental Engineer (258-5712) and Louis Pattan, Sr. Engineering Technician (258-5728). The annual report, manifests and waste stream analysis were reviewed before the plant walk through inspection was completed.

During the plant inspection the following Sites were observed:

SITE 1-1 Bullet Plating Facility (Zone 1) - Two 55 gallon drums (S01) of Cyanide contaminated rinsate were observed at this site. These drums have been stored at this site since September 9, 1991. Also observed at this site was the cyanide destruct unit system. This unit discharges to the Winchester wastewater treatment system pursuant to the facility's NPDES permit.

SITE 1-9 Lab solvent accumulation point (Zone 1) - This site is located within Zone 1 and is the location where spent solvent from the lab are accumulated for less than 90 days. One 55 gallon drum (S01) of chlorinated and one 55 gallon drum (S01) of nonchlorinated solvent were observed at this site. These drums were properly stored, labeled and dated.

SITE 4-9 Lead contaminated tumbling media (Winchester Zone 4) - This area is where lead contaminated tumbling media is stored in 1 cubic yard boxes for a period of less than 90 days. Fourteen 1 cubic yard boxes were observed at this site. Operating, inspection and training records were observed at this site.

SITE 4-8 This is a satellite accumulation area for chlorinated spent solvent. One 55 gallon satellite drum (S01) of solvent was observed at this site.

SITE 4-2(a) Manufacturing Reclamation Facility (MRF - Zone 4) -

1) Fenced Storage Area - Eleven 55 gallon drums (S01) of closure rinsate from Site 4-2(a) and Site 1-13 have been stored in this area since September 1990. Two of these rinsate drums were in very poor condition. Olin was asked to place these drums in overpack containers to prevent any leakage pursuant to 725.271. The placing of the drums in the overpack containers was completed by November 15, 1991 and, as a result, the apparent violation will not be alleged.

2) The Spent Solvent Storage Area is used as a 90 day accumulation point and it receives spent solvent from several Zones. Five 55 gallon drums (S01) of chlorinated solvents and nine 55 gallon drums (S01) of nonchlorinated solvents were present at this site. These drums were well below the 90 day accumulation time frame.

3) Two 40-foot semi trailers were observed at this site. Only one of the trailers contained any waste. It contained one 1 cubic yard box of lead contaminated scrap.

4) A building has been constructed at this site to store mercury contaminated ammo and debris. It was put into service on September 26, 1991. At the time of this inspection, eight 4.5 gallon boxes of mercury contaminated ammo were observed. According to the Part B permit issued to Olin Corporation, the mercury contaminated ammo is to be stored in 55 gallon drums at this site.

SITE 1-11 Winchester Waste Water Treatment Plant (Zone 6) - Sludge is accumulated at this site in 15 cubic yard roll-off containers. At the time of this inspection, approximately 45 cubic yards of sludge were observed.

The Zone 6 surface impoundment will be closed. However, delayed closure is being proposed at this unit. This will allow Olin to continue using the impoundment for non-hazardous wastewater while ground water monitoring will be on-going. Upon observation, the lagoon contained a small amount of rainwater. The facility continues doing daily inspections and employee training as it relates to the lagoon.

SITE 3-1 Zone 3, Site 3-1, was inspected on November 15, 1991. The facility is also attempting to obtain a Part B permit for the two incinerators located at Zone 3-1. The Zone 3-1 incinerators are being operated to burn the following explosives containing hazardous wastes:

1. Primer Mix Scrap - Class A Explosives
2. Smokeless Powder Scrap - Class B Explosive
3. Nitrocellulose Scrap - Ignitable Waste

In addition to these hazardous wastes, the facility will also incinerate combustible factory trash. This is the primary purpose of the two incinerators which generate steam through the use of two-heat boilers.

Olin is storing their baghouse dust in metal containers for easy transport to the waste water treatment facility as well as storage in 1 cubic yard bags. Olin is currently using the baghouse dust as a lime substitute at their wastewater treatment plant. Olin had two metal containers of baghouse dust on site. Also, Olin had 4 roll-off boxes of incinerator ash on site at the time of this inspection.

During the inspection of this facility, the following discrepancies were observed:

Site 1-1 had two drums (S01) of cyanide contaminated rinsate stored for over one year and Site 4-2(a), the fenced area, had 11 drums of rinsate stored for over one year. This is an apparent violation of 728.150(c).

Discrepancies were found during the review of the facility's manifest records. Several "Land Ban" records were not retained for waste being off for disposal. Six manifests were found to be deficient of these records. Two of the records were produced on the November 15, 1991 inspection, the other four have yet to be received. This is an apparent violation of 728.107 (a) (6).

Olin's Part B permit states that the mercury contaminated ammo will be stored in 55 gallon drums at site 4-2(a). This inspection revealed that the mercury contaminated ammo is being stored in 4.5 gallon boxes. This is an apparent violation of Section 703.121 (a) (2) specifically and the Part B permit issued April 2, 1990, revised April 22, 1991, Section II (B) (2).

APPROX. SCALE IN MILES
LOCATION MAP

LEGEND

- RCRA UNITS
- 90-DAY HAZARDOUS WASTE STORAGE UNITS

RCRA PERMITTED SITES

SITE	DESCRIPTION
3-1	Zone 3 Incinerator Explosives Burn
4-2a	Mercury-Contaminated Ammo and Debris Storage

90-DAY HAZARDOUS WASTE STORAGE UNITS

SITE	DESCRIPTION
1-1	PLATING FACILITY SCRAP CYANIDE TREATMENT TANK & WASTE STORAGE PAD
1-9	ANALYTICAL LAB SPENT SOLVENT STORAGE
1-11	ZONE 6 WWTF AND WINCHESTER WWTF SLUDGE STORAGE
1-12	ZONE 1 TUMBLING MEDIA STORAGE
3-1	ZONE 3 INCINERATORS ASH, BACHOUSE DUST STORAGE, AND MIX MILLER FIXATION TANK
4-9	T-500 TUMBLING MEDIA STORAGE

SITE	DESCRIPTION
4-2a	(1) FENCED STORAGE AREA (2) VAN BOX TRAILER STORAGE (3) SPENT SOLVENT STORAGE

SCALE IN FEET
1000

OLIN
EAST ALTON, ILLINOIS



LAW ENVIRONMENTAL
INC.

MAIN PLANT FACILITY

FIGURE 1

DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

PHOTOGRAPH TAKEN TOWARD THE:

South Site 1-9

ROLL# 1734 PHOTO# 0

PHOTOGRAPH BY:

Will D. [Signature]



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

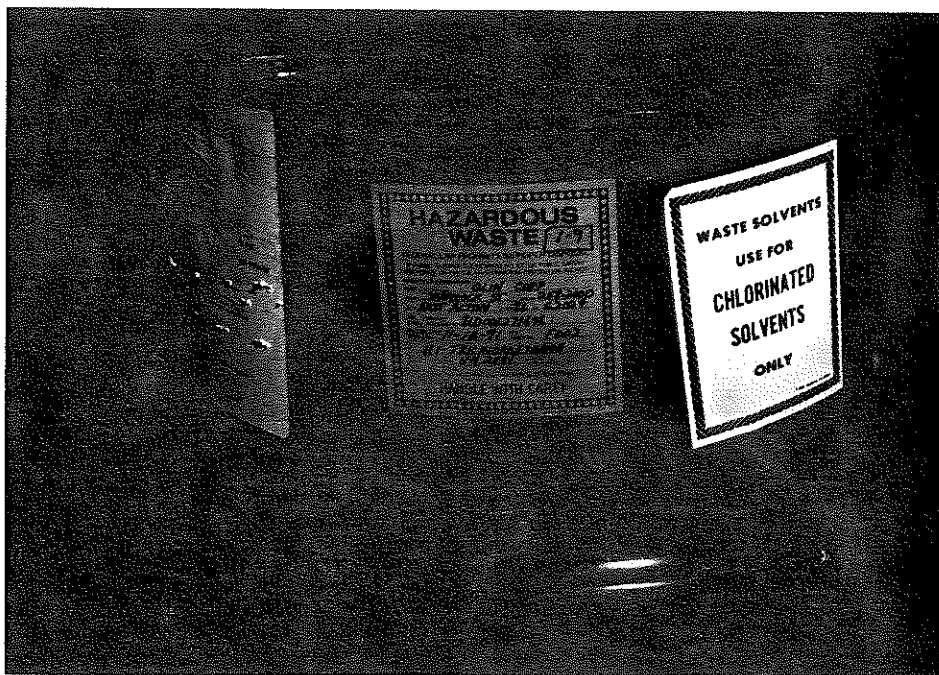
PHOTOGRAPH TAKEN TOWARD THE:

South Site 1-9

ROLL# 1734 PHOTO# 1

PHOTOGRAPH BY:

Will D. [Signature]



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

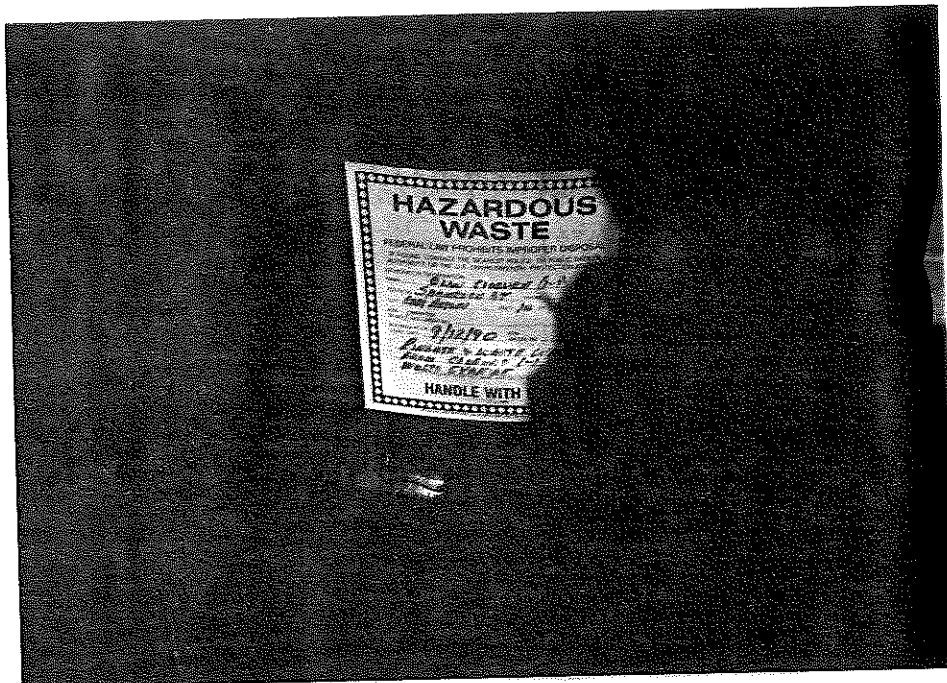
PHOTOGRAPH TAKEN TOWARD THE:

North Site 1-1

ROLL# 1734 PHOTO# 2

PHOTOGRAPH BY:

Will D. [Signature]



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

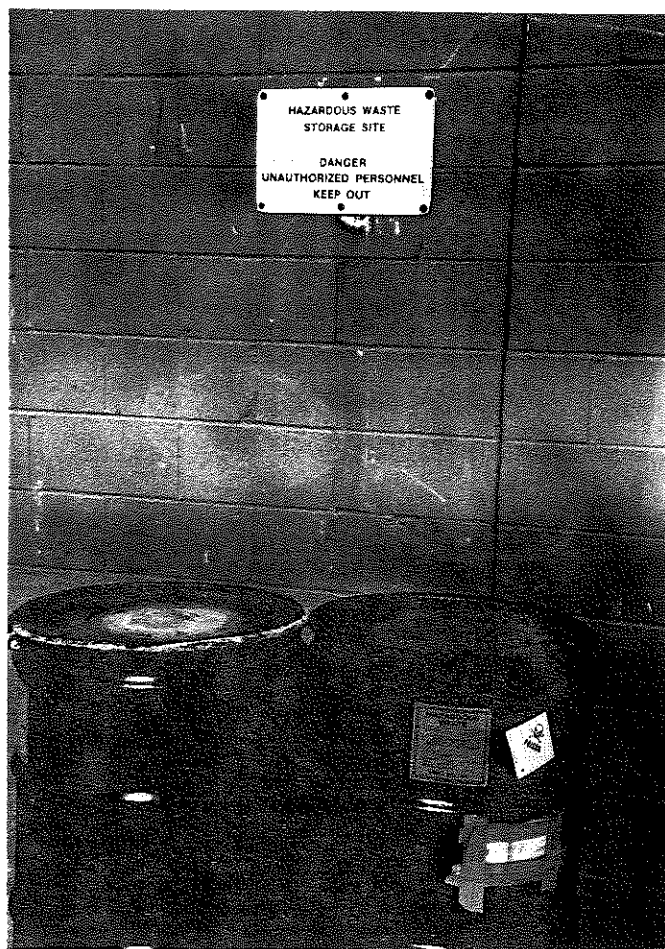
PHOTOGRAPH TAKEN TOWARD THE:

North Site 1-1

ROLL# 1734 PHOTO# 3

PHOTOGRAPH BY:

Will D. [Signature]



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

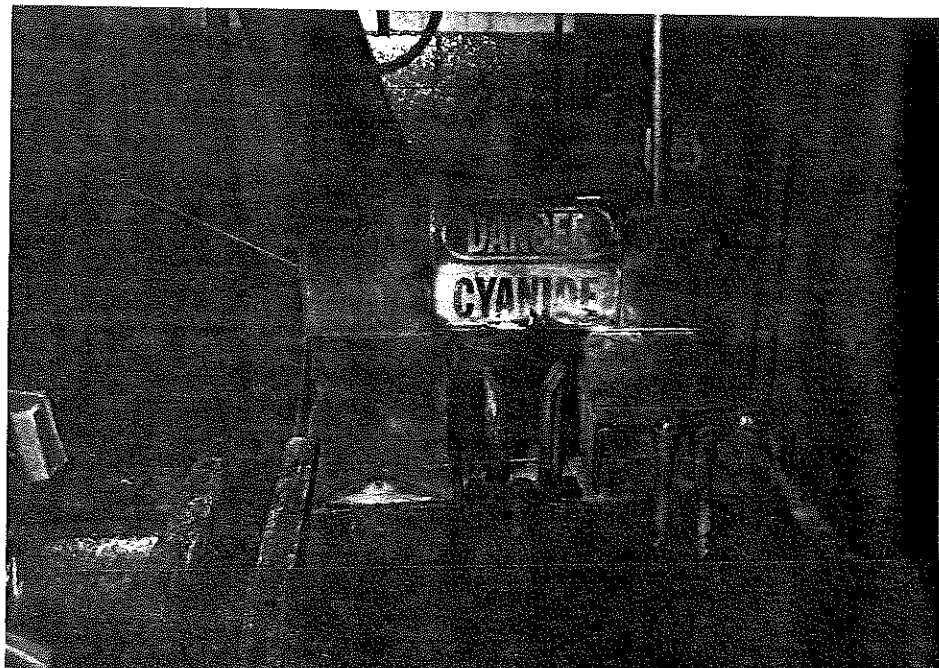
PHOTOGRAPH TAKEN TOWARD THE:

South Site 1-1

ROLL# 1734 PHOTO# 5

PHOTOGRAPH BY:

Will D



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

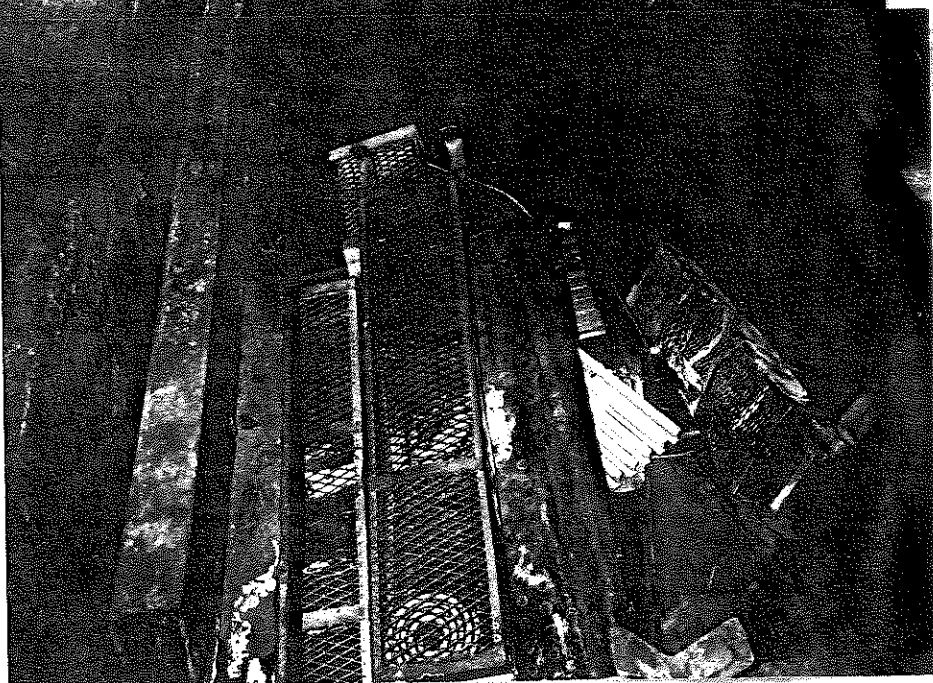
PHOTOGRAPH TAKEN TOWARD THE:

South Site 1-1

ROLL# 1734 PHOTO# 4

PHOTOGRAPH BY:

Will D



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

PHOTOGRAPH TAKEN TOWARD THE:

North Northwest Site 1-6

ROLL# 1734 PHOTO# 7

PHOTOGRAPH BY:

Will D. [Signature]

DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

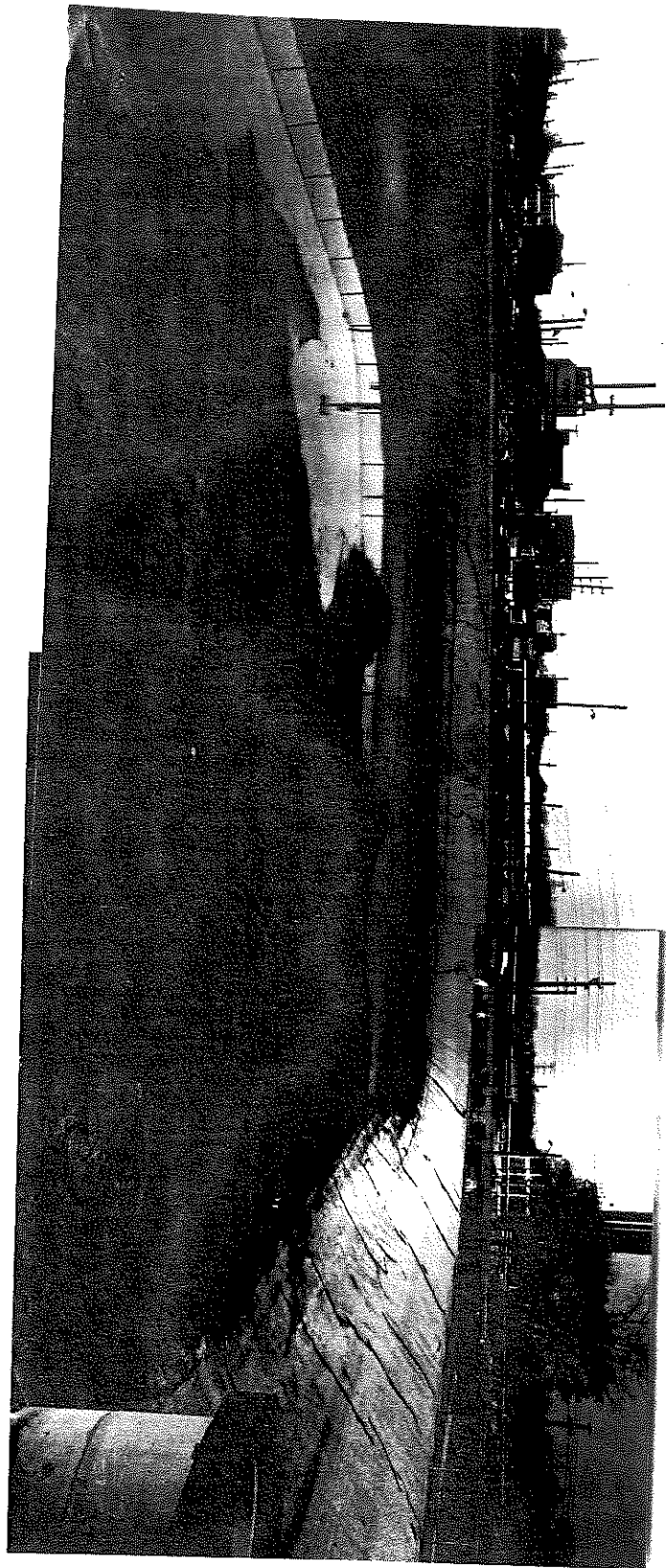
PHOTOGRAPH TAKEN TOWARD THE:

West Northwest Site 1-6

ROLL# 1734 PHOTO# 8

PHOTOGRAPH BY:

Will D. [Signature]



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

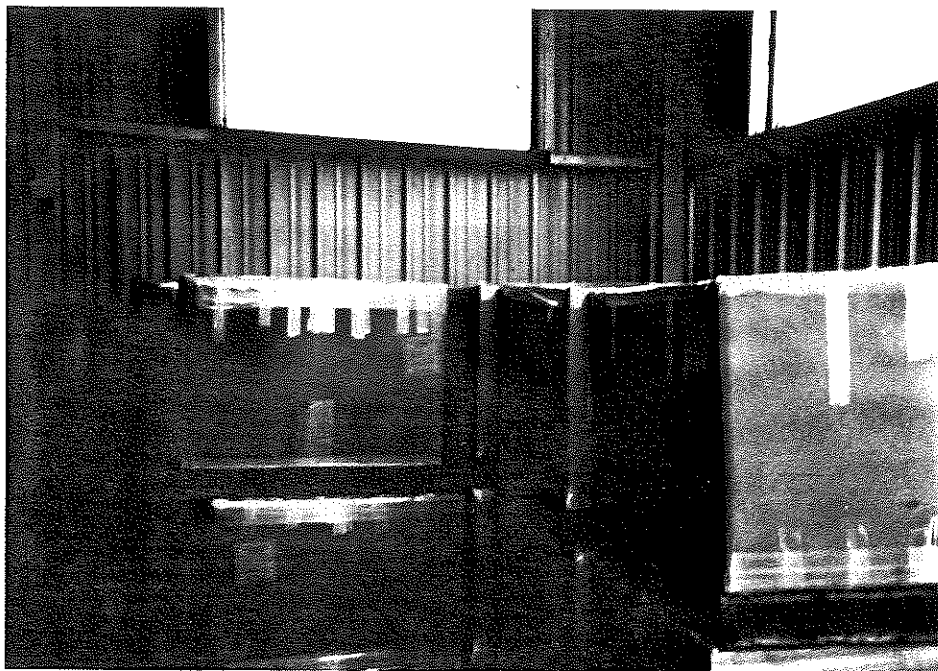
PHOTOGRAPH TAKEN TOWARD THE:

North Site 4-9

ROLL# 1734 PHOTO# 8

PHOTOGRAPH BY:

Will D. D.



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

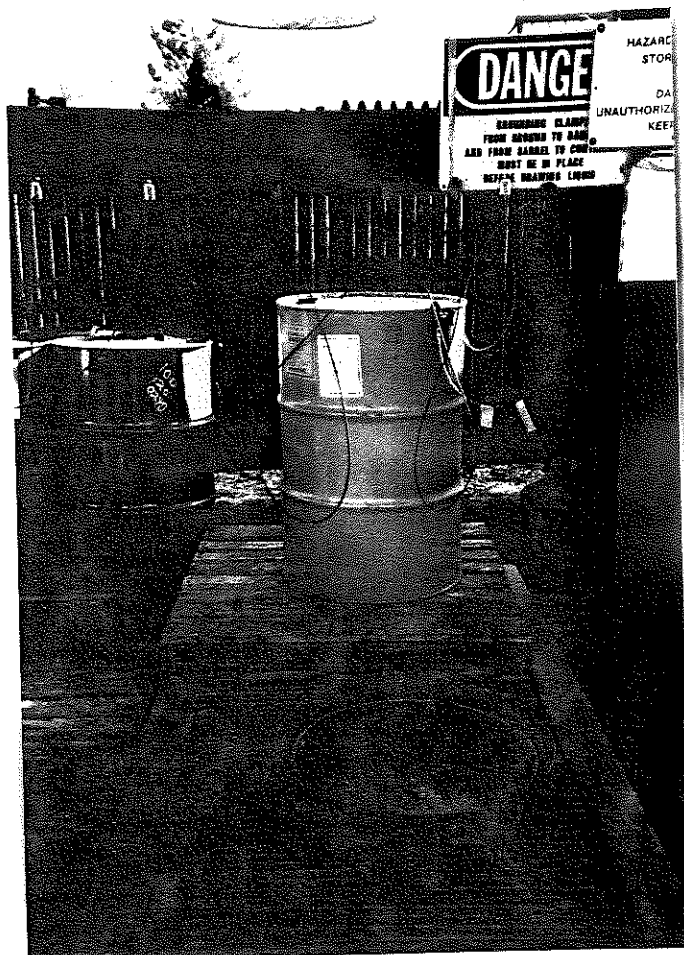
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South Site 4-8

ROLL# 1734 PHOTO# 9

PHOTOGRAPH BY:

Will D. D.



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

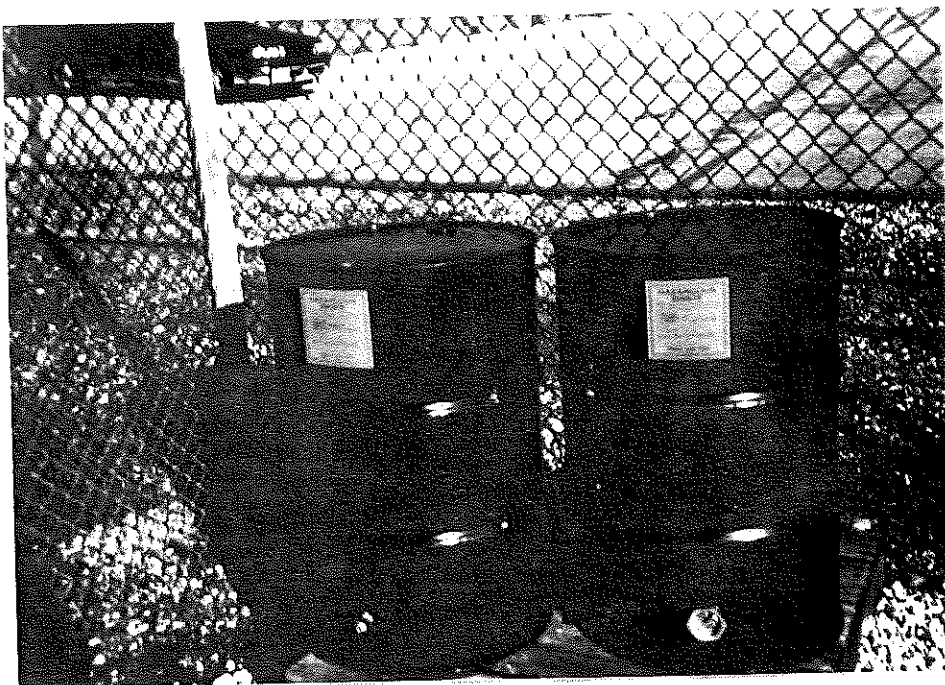
PHOTOGRAPH TAKEN TOWARD THE:

East Site 4-2a

ROLL# 1734 PHOTO# 10

PHOTOGRAPH BY:

John D. [Signature]



DATE: November 13, 1991

TIME: 9:30 - 3:30

I.D. 1190200002

Madison County

Olin Corporation

PHOTOGRAPH TAKEN TOWARD THE:

East Site 4-2a

ROLL# 1734 PHOTO# 11

PHOTOGRAPH BY:

John D. [Signature]



DATE: November 15, 1991

TIME: 2:45 p.m.

I.D. 1190200002

Madison County

E. Alton/Olin Corp. Main Plant

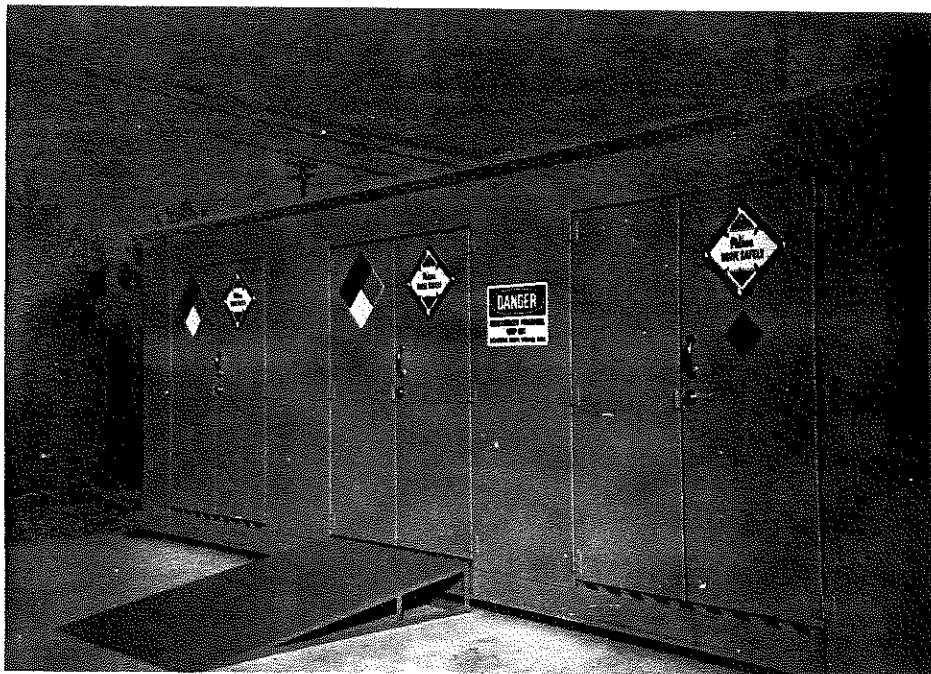
PHOTOGRAPH TAKEN TOWARD THE:

Northeast Site 4-2a

ROLL# 1736 PHOTO# 1

PHOTOGRAPH BY:

J. D. [Signature]



DATE: November 15, 1991

TIME: 2:46 p.m.

I.D. 1190200002

Madison County

E. Alton/Olin Corp. Main Plant

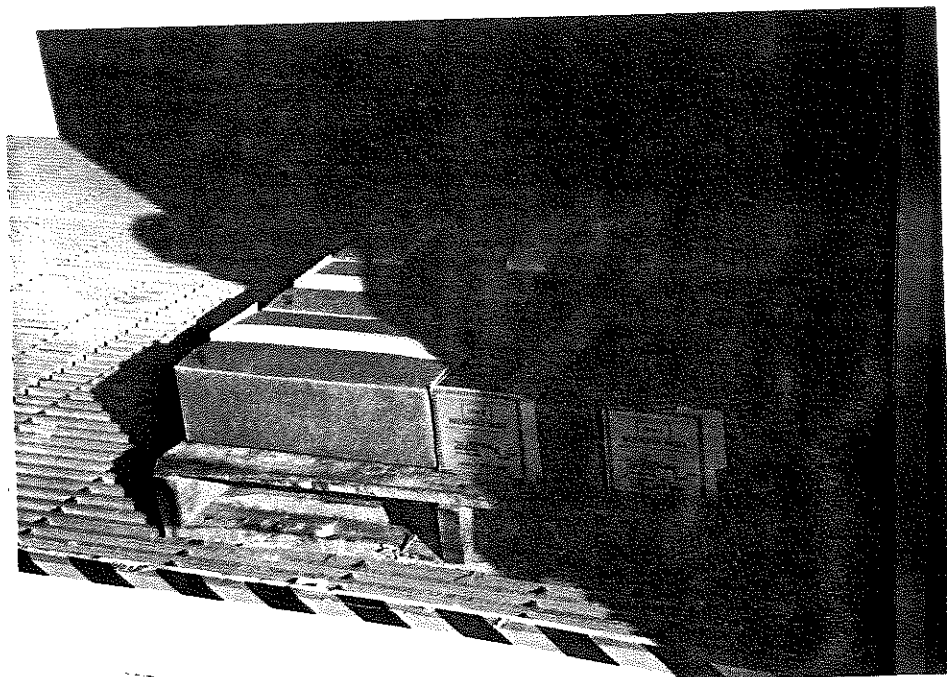
PHOTOGRAPH TAKEN TOWARD THE:

Northeast Site 4-2a

ROLL# 1736 PHOTO# 2

PHOTOGRAPH BY:

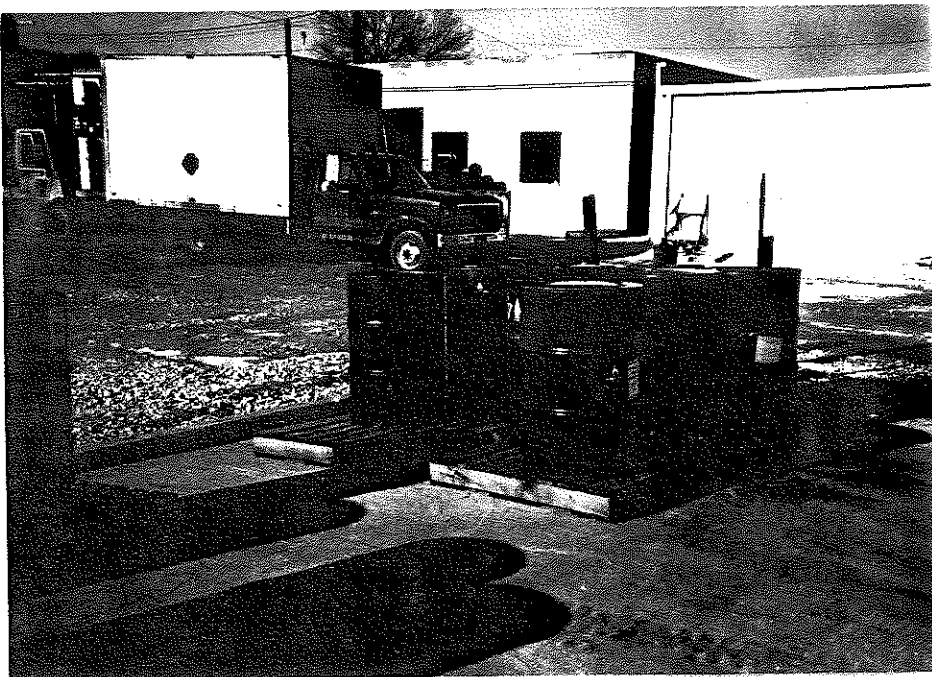
J. D. [Signature]



DATE: November 15, 1991
TIME: 2:47 p.m.
I.D. 1190200002
Madison County
E. Alton/Olin Corp. Main Plant
PHOTOGRAPH TAKEN TOWARD THE:
Southwest Site 4-2a
ROLL# 1736 PHOTO# 3
PHOTOGRAPH BY:
Will D



DATE: November 15, 1991
TIME: 2:48 p.m.
I.D. 1190200002
Madison County
E. Alton/Olin Corp. Main Plant
PHOTOGRAPH TAKEN TOWARD THE:
Southwest Site 4-2a
ROLL# 1736 PHOTO# 4
PHOTOGRAPH BY:
Ch. Brown



DATE: November 15, 1991

TIME: 10:00 a.m.

I.D. 1190200002

Madison County

E. Alton/Olin Corp. Main Plant

PHOTOGRAPH TAKEN TOWARD THE:

East Site 4-2a

ROLL# 1736 PHOTO# 5

PHOTOGRAPH BY:

Chris Cahowaty



DATE: November 15, 1991

TIME: 10:30 a.m.

I.D. 1190200002

Madison County

E. Alton/Olin Corp. Main Plant

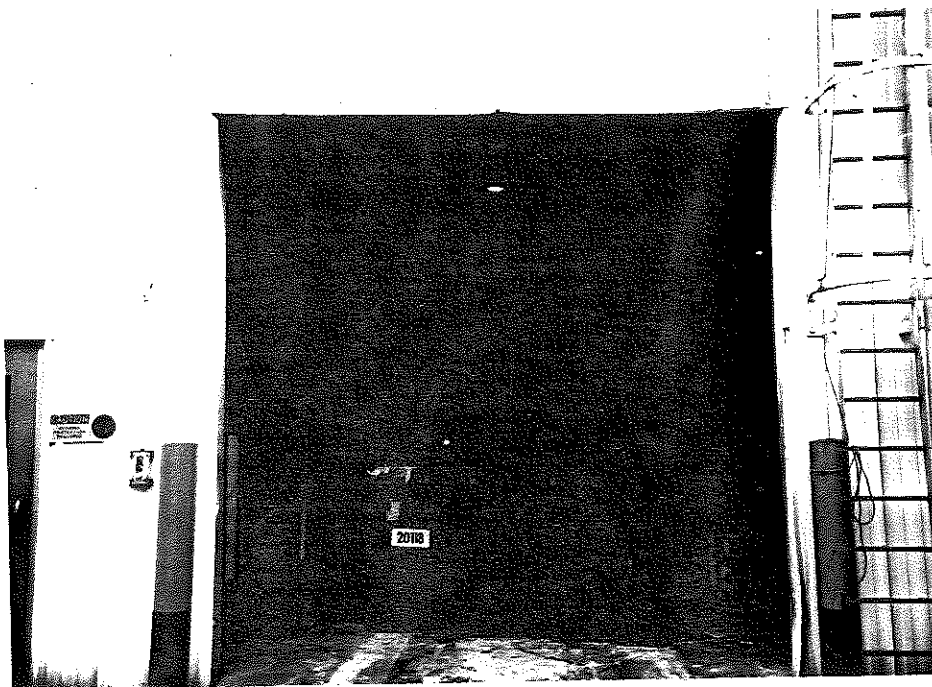
PHOTOGRAPH TAKEN TOWARD THE:

Northeast Site 3-1

ROLL# 1736 PHOTO# 6

PHOTOGRAPH BY:

Chris Cahowaty



DATE: November 15, 1991

TIME: 10:31 a.m.

I.D. 1190200002

Madison County

E. Alton/Olin Corp. Main Plant

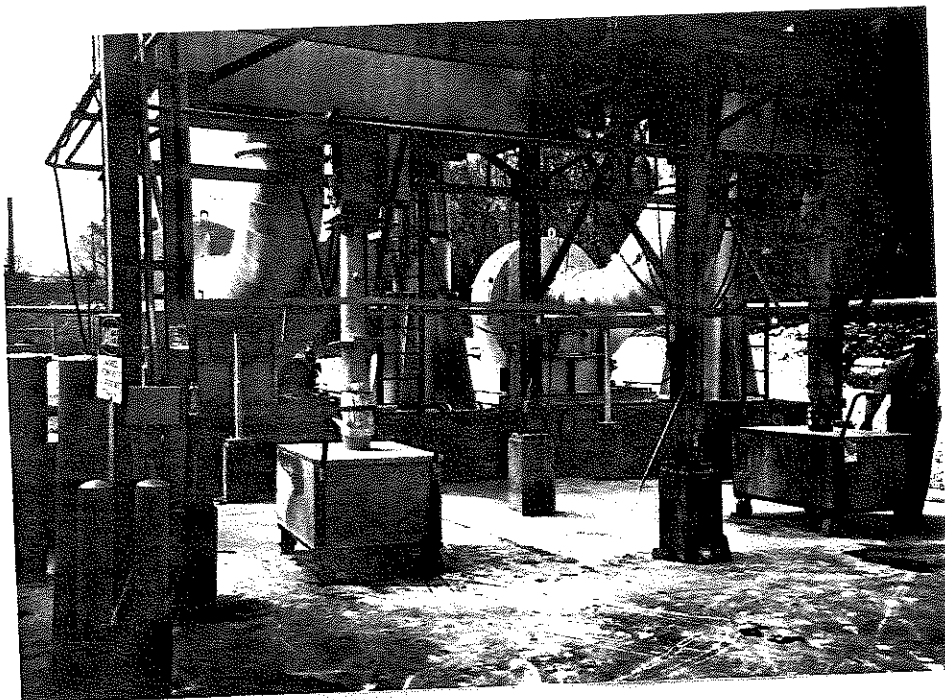
PHOTOGRAPH TAKEN TOWARD THE:

Southwest Site 3-1

ROLL# 1736 PHOTO# 7

PHOTOGRAPH BY:

Ch. Chow



DATE: November 15, 1991

TIME: 10:32 a.m.

I.D. 1190200002

Madison County

E. Alton/Olin Corp. Main Plant

PHOTOGRAPH TAKEN TOWARD THE:

Northeast Site 3-1

ROLL# 1736 PHOTO# 8

PHOTOGRAPH BY:

Ch. Chow



DATE: November 15, 1991

TIME: 10:40 a.m.

I.D. 1190200002

Madison County

E. Alton/Olin Corp. Main Plant

PHOTOGRAPH TAKEN TOWARD THE:

West Site 3-1

ROLL# 1736 PHOTO# 9

PHOTOGRAPH BY:

Ch. Chmorsky



DATE: _____

TIME: _____

I.D. _____

_____ County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# _____ PHOTO# _____

PHOTOGRAPH BY:

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart B: Prohibitions Section 703.121: RCRA Permits				<p>Site 4-2a has a Part B permit, other which closed at the time of the inspection Subject to 725 standards, Closure plans have been submitted for closure of those sites</p> <p>→ Mercury Contaminated waste is to be stored in 55 gal drums. Inspection showed Mercury Cont. Ammo stored in 4.5 gal boxes.</p>
			a	<p>Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:</p> <p>1) With a RCRA permit for the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) In conformance with all conditions imposed by the RCRA permit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>				
			b	<p>Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			b	<p>Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

IEPA/DLPC
25 NOV 1991
RECEIVED

Mulison Co.
Olin Corporation 1190200002
November 13+15 1991 Inspection

PER-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	<input checked="" type="checkbox"/>			
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1				Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes <u>X</u> No <u> </u> Is the facility only operating with a RCRA permit? Yes <u> </u> No <u>N/A</u> <u>X</u> NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			X	
OTH	1				Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes <u>X</u> No <u> </u> N/A <u> </u> 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes <u>X</u> No <u> </u> N/A <u> </u> NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	X			

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>Section 703.154: Prohibitions During Interim Status</p> <p>During interim status, has the facility refrained from:</p> <p>a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p>Section 703.155: Changes During Interim Status</p> <p>NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.</p> <p>d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F.U. Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
MAN	2				PART 722 GENERATOR STANDARDS Subpart B: The Manifest	<input checked="" type="checkbox"/>			
					Section 722.120: General Requirements				
					a Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					b Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130. Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
					d In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
MAN	2				Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
MAN	2				Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2				Section 722.123: Use of the Manifest For each manifest received, has the generator: 1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <u>X</u> No <u> </u></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <u>X</u> No <u> </u></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <u>X</u> No <u> </u></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <u> </u> No <u> </u> N/A <u>X</u></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <u> </u> No <u> </u> N/A <u>X</u></p>				

GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1	X			PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			X	
OTH	1	X			Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			X	
OTH	1	X			Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____ b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____			X	

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.	X		X	
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	X		X	

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 722.134: Accumulation Time	<input checked="" type="checkbox"/>			
				<p>NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p>				
			a1	<p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-2(a)

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <p>- Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- Complying with the requirements of:</p> <p>1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-26

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			c2	<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Are the containers with the excess amounts marked with the date accumulation began? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes <input type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-27

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years:	<input checked="" type="checkbox"/>			
			a - A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - A copy of each exception report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c - Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d Does a generator who is involved in any unresolved en- forcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> d If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>					

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	X			
MAN	1				Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			X	

GEN-D-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p> <p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>			X	

GEN-D-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1/2				PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes _____ No <u>X</u>			X	
					NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes _____ No _____ NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.				

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
MAN	1				PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			X	
					b1 Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and				
					b2 Has the importer or his agent signed the manifest in place of the generator; and				
					b2 Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
					c Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	2	X			PART 722 GENERATOR STANDARDS Subpart G: Farmers Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ <p>NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>			X	

GEN-G-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General Section 723.110: Scope Has the firm ever transported hazardous waste into the United States from abroad? Yes ____ No <input checked="" type="checkbox"/> Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes ____ No <input checked="" type="checkbox"/> NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				
OTH	1			Section 723.111: USEPA Identification Number Has the transporter obtained a USEPA identification number?	<input checked="" type="checkbox"/>			
OTH	1	X	a	Section 723.112: Transfer Facility Requirements Has a transporter of hazardous waste stored manifested shipments of such waste: - For a period of 10 days or less? Yes ____ No ____			X	Facility is also a TSD.

TR-A-1

Area	Class	SU Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>- Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes _____ No _____</p> <p><u>NOTE:</u> A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1/2			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping				<i>Facility is the generator, transporter, and TSD of the waste.</i>
				Section 723.120: The Manifest System				
			a	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Prior to transporting hazardous waste, has the transporter apparently: <ul style="list-style-type: none"> - Signed and dated the accompanying manifests? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - Returned a signed copy to the generator before leaving the generator's property? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				
			c	Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
d		Has the transporter who delivers hazardous waste to another transporter or to the designated facility:						

TR-B-1

Area	Class	Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			g	Has the transporter who transports hazardous waste out of the United States: 1) Indicated on the manifest the date the hazardous waste left the United States? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TR-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			3) Apparently returned a signed copy of the manifest to the generator? Yes ____ No ____ 4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes ____ No ____ Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes ____ No <u>X</u> NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes ____ No ____ AND If "Yes", is the transporter recording on a log or shipping paper: 1) Name, address and USEPA ID number of the generator of the waste; AND 2) Quantity of waste accepted; AND	X			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) All shipping information required by U.S.D.O.T;</p> <p>AND</p> <p>4) The date the waste is accepted? Yes _____ No _____</p> <p>AND</p> <p>Does the transporter carry this record when transporting waste to the reclamation facility? Yes _____ No _____</p> <p>AND</p> <p>Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes _____ No _____</p> <p>Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:</p> <p>1) The designated facility on the manifest? Yes _____ No _____</p> <p>OR</p> <p>2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes _____ No _____ N/A _____</p> <p>OR</p>				

TR-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.		
			Sub Sec		Yes	No				
OTH	2			3) The next designated transporter? Yes ____ No ____ N/A <u>X</u> OR 4) The place outside the United States designated by the generator? Yes ____ No ____ N/A <u>X</u> <u>NOTE:</u> A "No" answer can still be in compliance.				<i>Copies of manifests kept on site.</i>		
			b	In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest, did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? Yes ____ No ____ N/A <u>X</u>						
				Section 723.122: Recordkeeping			<u>X</u>			
			a	Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? Yes <u>X</u> No ____						
			b	Has the transporter followed the procedures prescribed in Section 723.122(b) for recordkeeping for bulk shipments of hazardous waste by water? Yes ____ No ____ N/A <u>X</u>						
			c	Has the transporter followed the procedures prescribed in Section 723.122(c) for shipments of hazardous waste by rail within the United States? Yes ____ No ____ N/A <u>X</u>						

TR-B-5

Area	Class	SU Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			d	<p>Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter?</p> <p>Yes _____ No _____ N/A <u>X</u></p>				
			e	<p>Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p style="text-align: center;">OR</p>				
			e	<p>If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them?</p> <p>Yes _____ No _____ N/A <u>X</u></p>				

TR-B-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges Section 723.130: Immediate Action a Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes _____ No _____ c Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes _____ No _____			X	
OTH	1	X		Section 723.131: Discharge Clean-Up After a discharge of hazardous waste did the transporter: <ul style="list-style-type: none"> - Clean-up the discharge? Yes _____ No _____ - Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes _____ No _____ 			X	



217/782-6762

RCRA Log 31-M-1

Refer to: 1190200002 -- Madison County
Olin Main Plant Facility
ILD006271696
Mod. 31-M-1
RCRA Part B -- Administrative Record

Part B Permit
Revised 4/22/91

RECEIVED
IEPA

APR 25 1991

COLLINSVILLE OFFICE

April 22, 1991

Olin Corp.
427 North Shamrock St.
East Alton, Illinois 62024-1174

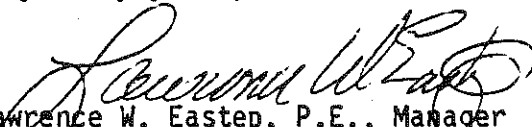
Gentlemen:

This letter is in response to the Class 2 modification submitted by Olin on November 9, 1990 requesting a modification to the above referenced RCRA Part B Permit. The Agency has reviewed the information contained in your submittal and has determined that Olin may modify the facility in accordance with the information submitted in Log number 31-M-1 in accordance with the revised Part B permit. This determination is based upon a review of (1) the RCRA Part B Permit issued to the Olin facility (Log No. 31), (2) 35 Ill. Adm. Code Subtitle G, and (3) the information contained in your submittals. Operations must be conducted in accordance with the approved RCRA Part B Permit issued to Olin and all subsequent modifications to the Part B Permit. A summary of the revisions to the permit are included as Attachment 1 to this letter.

The Illinois EPA portion of the permit has been revised to incorporate the changes identified in Log Number 31-M-1. Only the revised IEPA permit is enclosed, since no modification of the USEPA permits has occurred.

If you have any questions concerning this permit, please contact Ted Dragovich at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:TJD:bjh/sp/3088k/1

Attachments: Hazardous Waste Management Permit

cc: Division File
Collinsville Region
USEPA Region V
Permit Reviewer
Compliance

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE MANAGEMENT RCRA PERMIT

IEPA #1190200002 -- Madison County
USEPA ILD #006271696
Olin Main Plant Facility
RCRA -- Part B - Administrative Record

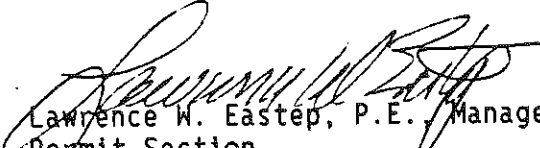
Issue Date: April 2, 1990
Effective Date: May 5, 1990
Expiration Date: April 1, 2000
Revised: April 22, 1991 (31-M-1)

Olin Corporation
427 North Shamrock Street
East Alton, Illinois 62024-1174

A Part B permit is hereby granted pursuant to the Resource Conservation and Recovery Act (RCRA), Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) parts 702, 703, 705, and 720 through 729 to the Olin Corporation's Main Plant Facility to construct, maintain, and operate a waste management facility involved in the storage of hazardous waste in containers. Olin Corporation's Main Plant Facility is located in East Alton, Illinois.

This RCRA Part B permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 1/2, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which are issued. This Permit contains 23 pages including attachments A, B, C and D.

If you have any questions regarding this permit, please contact Ted Dragovich at 217/782-6762.


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:bjh/sp/3088k/3

cc: Division File
Administrative Record
Collinsville Region
Charles Northrup, Enforcement
USEPA Region V, George Hamper

OLIN - MAIN PLANT FACILITY
RCRA PERMIT
ILD006271696
1190200002
LOG #31

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I. General Facility Description

Olin Corporation (Olin) operates two manufacturing plants in East Alton, Illinois which comprise its "Main Plant Facility" (MPF). The Brass Group manufactures copper base alloy strip and fabricated products; the Defense Systems Group, Winchester, Division manufactures small arms ammunition, ammunition components, and explosives. The MPF comprises an area of 1,273.01 acres.

Non-hazardous wastes generated at the Main Plant Facility can be broken down into several categories, which are: Factory trash, waste oils, scrap small arms ammunition and primers, oil-contaminated solid waste, asbestos wastes, and water pollution control wastes. Most of this type of waste is sent to off-site landfills, however, some is sent to Zone 3 for incineration.

Hazardous wastes generated at the Main Plant Facility can be broken down into several categories, which are: Solvent wastes, wastes generated from small arms ammunition and explosives manufacturing, plating wastes, air and water pollution control wastes, and tumbling media.

The wastes generated from small arms ammunition and explosives manufacturing such as smokeless powder scrap, nitrocellulose scrap, priming mix scrap, as well as the tumbling media will be incinerated on-site when the Zone 3 Incinerators (Site 3-1) receive a Part B Permit. All other hazardous wastes are shipped off-site to permitted hazardous waste facilities.

II. List of Required Plans and Documents Contained in the Approved Permit Application.

<u>Plan</u>	<u>Location</u>
1. Waste Analysis Plan	Section C
2. Inspection Plan	Section F
3. Contingency Plan	Section G
4. Training Plan	Section H
5. Closure Plan	Section I
6. Detailed Design Plans and Specifications for Container Storage.	Section D Figures D.1 and D.2

Approved Permit Application

The application was originally submitted in January 1984. Due to numerous revisions, the approved permit application shall consist of the most recent complete submission which was dated October 3, 1988 as well as submissions dated January 17, 1989, April 4, 1989, April 11, 1989, August 7, 1989, August 21, 1989, August 24, 1989, and September 7, 1989. Where a requirement of this permit is inconsistent with the application, the permit shall control.

Olin's comments on the draft permit were received on November 16, 1989. The wording of Condition H.2 of this permit was modified in response to these comments.

The application for modification consists of Log 31-M-1, dated October 1990 and the subsequent revisions.

Section III CONTAINERS

A. SUMMARY

The container storage building is located in zone no. 4 of the main plant facility. *FA Compliance yes*

The permittee will only store waste which does not contain free liquids in the container storage area. *yes*

B. WASTE IDENTIFICATION

1. The storage of all hazardous waste containers shall be located in the approved storage area. The location of the storage area is shown in the approved application for modification of the permit log 31-M-1. *yes*

2. The Permittee will store all waste containers in accordance with the following volume, type of waste, and content requirements.

<u>Site Number</u>	<u>Description of Hazardous Waste</u>	<u>Hazardous Waste Number</u>	<u>Maximum Number and Type of Containers</u>	<u>Storage Area</u>
4-2a	Mercury Contaminated Ammunition	D008	8 - 55 gal. drums	192 sq. ft. <i>yes</i>
4-2a	Mercury Contaminated Debris	D008, D001	96-4.5 gal. boxes	192 sq. ft. <i>NO</i>

3. The Permittee is prohibited from storing waste in the permitted unit that is not identified in Condition B. 2. above. *yes*

4. The Permittee is prohibited from storing waste which contains free liquids, as determined by the paint filter test, in the Permitted Unit. *yes*

5. The maximum number and type of containers identified in condition III(B)(2) above shall be a total of 872 gallons. *yes*

C. CONDITION OF CONTAINERS -- If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in accordance with the Approved Permit Application. *OKAY*

D. COMPATIBILITY OF WASTE WITH CONTAINERS -- The Permittee must use a container made of or lined with material which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. *OKAY*

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E. MANAGEMENT OF CONTAINERS -- The Permittee shall comply with the following management practices:

1. A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. *yes*
2. A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak. *OKAY*
3. A minimum of three foot aisle space shall be maintained between rows of pallets.
4. Containers shall be placed in the container storage area in such a manner as to allow the inspector to view at least one side of each container without moving any containers. *OKAY*

F. INSPECTION

The Permittee shall inspect the container area weekly, in accordance with the inspection schedule, specified in Section F of the application, to detect leaks and deterioration of containers and the containment system caused by corrosion or other factors. *yes*

G. CLOSURE -- At closure, at a minimum, all hazardous waste and hazardous waste residues must be removed from the containment system. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residue must be decontaminated or removed. Closure of the container storage area shall be carried out in accordance with the closure plan in the approved permit application, as modified below: *N/A*

1. The Permittee shall notify the Agency's DLPC in writing of its intent to close the container storage area at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit the sampling and analysis plan to be used in demonstrating the storage area has been properly decontaminated. This plan shall be approved by the Agency's DLPC in writing prior to being implemented. Agency review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Illinois Environmental Protection Act. The response from the Agency shall approve and establish:
 - a. The sampling plan;
 - b. What contaminants must be analyzed for;
 - c. The level at which decontamination is considered complete.
2. Sweepings collected during closure of the container storage area shall be managed as a hazardous waste. All washwater and rinsate generated during the closure of the unit shall also be managed as a hazardous waste, unless it can be shown to be exempt under 35 IAC 721.103(a)(2)(D). *N/A*

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3. The Permittee shall provide post-closure care in accordance with 35 IAC Part 724 for the container storage area if all of the hazardous wastes or contaminated soils cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in the permit and in the approved closure plan. If it is determined that the closure requirements cannot be met and post-closure care is required, this Permit will be modified to require post-closure care for the container storage area in accordance with 35 IAC, Subtitle G, Part 724, Subparts G and H. N/A
4. Should post-closure care, as described in Condition G.3 above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure and post-closure care plan for this unit, within thirty (30) days following discovery that clean closure cannot be accomplished. If a determination is made to not pursue clean closure prior to the implementation of the closure plan for the container storage area, the modification request shall be made no later than sixty (60) days after the determination is made. N/A
5. Financial assurance for closure and post-closure of the container storage area, if required in accordance with Conditions G.3 and G.4 above, shall be provided within thirty (30) days following modification of the permit under the provisions of Condition G.4 above. N/A
6. Within sixty (60) days after closure of the container storage area is complete, the Permittee shall submit certification to the Agency that the unit has been closed in accordance with the approved closure plan. N/A

The closure certification forms in Attachment D to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer (registered in the State of Illinois) should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the container storage areas until the Agency approves the closure certification for the unit. The Agency's review of closure certification for partial or final closure will be conducted in accordance with 35 IAC 724.243.

A Closure Documentation Report is to be submitted with the closure certification which includes the following items, if applicable:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.

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- c. Copies of the waste manifests.
- d. A description of the sampling and analytical methods used.
- e. A chronological summary of closure activities and the cost involved.
- f. Tests performed, methods and results.
- g. Color photographs of closure activities which document conditions before, during and after closure.
- h. A scale drawing of all excavated areas and sample locations.

H. SPECIAL CONDITIONS FOR CONTAINER STORAGE

- 1. The Permittee shall construct the new container storage building within 6 months of the effective date of this permit. *SERVICE DATE OF*
- 2. The Permittee shall construct the container storage building in accordance with the approved designs and specifications that are included in the approved permit application. After completion of the construction of the unit but, prior to operation, the Permittee shall submit 2 copies of a Construction Certification Document to the Illinois EPA, Division of Land Pollution Control, Permit Section. The Construction Certification Document shall consist of a narrative describing the unit which was constructed, final as-built drawings, and a certification pursuant to 35 IAC 702.126(d) by both the owner/operator and an independent professional engineer registered in the State of Illinois that the unit has been constructed in accordance with the approved permit application and the as-built diagrams. Any deviations from the approved designs or specifications must be noted on the as-built drawings and the rationale for and impact of those deviations must be provided in narrative form. *9/26/91*
- 3. Each container placed into the container storage area shall be sampled in accordance with the waste analysis plan (W.A.P.). The sample shall be analyzed for free liquids according to the paint filter test (SW-846 Method 9095). *OKAY*
- 4. The mercury contaminated ammo shall be sampled and analysed at the same frequency as the other hazardous wastes, as specified in Section 3.5 of the W.A.P. (i.e., once a year).
- 5. All laboratories to which Olin ships samples of hazardous wastes must use SW-846 methods or other methods as approved by IEPA DLPC Permit Section.

ATTACHMENT A

STANDARD CONDITIONS

GENERAL REQUIREMENTS

1. EFFECT OF PERMIT. The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. PERMIT ACTIONS. This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. SEVERABILITY. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 700.107)
4. PERMIT CONDITION CONFLICT. In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. DUTY TO COMPLY. The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. DUTY TO REAPPLY. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Agency. (35 IAC 702.142 and 703.125)

7. PERMIT EXPIRATION. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee the Agency has not issued a new permit as set forth in 35 IAC 702.125.
8. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 IAC 702.143)
9. DUTY TO MITIGATE. In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 IAC 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittee shall furnish to the Agency, within a reasonable time, any relevant information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Agency, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. INSPECTION AND ENTRY. The Permittee shall allow an authorized representative of the Agency, upon the presentation of credentials and other documents as may be required by law, to:

OKAY

 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan. IN
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YES
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of the Agency at any time. The permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well. YES
- c. Records of monitoring information shall include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;
 - v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 IAC 702.150)YES

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14. REPORTING PLANNED CHANGES. The permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted facility. For a new HWM facility, the permittee may not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the permittee may not treat, store or dispose of hazardous waste in the modified portion of the facility, until:

YES

- a. The permittee has submitted to the Agency by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
- b.
 1. The Agency has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
 2. If, within 15 days of the date of submission of the letter in paragraph (a), the permittee has not received notice from the Agency of its intent to inspect, prior inspection is waived and the permittee may commence treatment, storage or disposal of hazardous waste. (35 IAC 703.244 and 702.152(a))

15. ANTICIPATED NONCOMPLIANCE. The Permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. For a new facility, the permittee shall not treat, store or dispose of hazardous waste; and for a facility being modified, the permittee shall not treat, store or dispose of hazardous waste in the modification portion of the facility, except as provided in Section 703.280, until:

1A

- i. The permittee has submitted to the Agency by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
- ii. Either:
 - a. The Agency has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

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- b. Within 15 days after the date submission of the letter in section 1 above, the permittee has not received notice from the Agency of its intent to inspect, the permittee may commence treatment, storage or disposal of hazardous waste.

(35 IAC 702.152(b) and 703.247)

16. TRANSFER OF PERMITS. This permit is not transferable to any person except after notice to the Agency. The Agency may require modification of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the appropriate Act. (See Sections 703.260 and 703.270, in some cases modification is mandatory.) (35 IAC 702.152(c)) *yes*

17. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d)) *yes*

18. COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e)) *yes*

19. TWENTY-FOUR HOUR REPORTING.

- a. The Permittee shall report to the Agency any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following: *N/A*

- i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
- ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.

- b. The description of the occurrence and its cause shall include:

- i. Name, address, and telephone number of the owner or operator;
- ii. Name, address, and telephone number of the facility;
- iii. Date, time, and type of incident;
- iv. Name and quantity of material(s) involved;

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COMPLIANCE

- v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Agency may waive the five day written notice requirement in favor of a written report within fifteen days. (35 IAC 702.152(f) and 703.245(b))
20. OTHER NONCOMPLIANCE. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 17, 18, and 19, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 19. (35 IAC 702.152(g))
21. OTHER INFORMATION. Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Agency, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h))
22. REPORTING REQUIREMENTS. The following reports required by 35 Ill. Adm. Code 724 shall be submitted in addition to those required by 35 Ill. Adm. Code 702.152 (reporting requirements):
- a. Manifest discrepancy report: if a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the permittee must immediately submit to the Agency a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))
 - b. Unmanifested waste report: The permittee must submit to the Agency within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)

yes

yes

yes

- c. Annual report: an annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)

23. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:

Illinois Environmental Protection Agency
Division of Land Pollution Control #24
Compliance Monitoring Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

24. SIGNATORY REQUIREMENT. All permit applications, reports or information submitted to the Agency shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
25. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC 161.
26. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:
- a. Waste analysis plan as required by 35 IAC 724.113(b) and this permit.
 - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this permit.
 - c. Contingency plan as required by 35 IAC 724.153(a) and this permit.
 - d. Closure plan as required by 35 IAC 724.212(a) and this permit.
 - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
 - f. Operating record as required by 35 IAC 724.173 and this permit.
 - g. Inspection schedules as required by 35 IAC 724.115(b) and this permit.

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GENERAL FACILITY STANDARDS

27. NOTICE OF WASTE FROM A FOREIGN SOURCE. The permittee who has arranged to receive hazardous waste from a foreign source must notify the Agency in writing at least four weeks in advance of the date the waste is expected at the facility. (35 IAC 724.112(a)) *N/A*
28. NOTICE OF WASTE FROM OFF-SITE. The Permittee who receives hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the permittee has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the facility operating record. (35 IAC 724.112(b)) *N/A*
29. GENERAL WASTE ANALYSIS. The Permittee shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113) *yes*
30. SECURITY. The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c). *yes*
31. GENERAL INSPECTION REQUIREMENTS. The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d). *yes*
32. PERSONNEL TRAINING. The Permittee shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e). *yes*
33. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE. The Permittee shall comply with the requirements of 35 IAC 724.117. *yes*

PREPAREDNESS AND PREVENTION

34. DESIGN AND OPERATION OF FACILITY. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131) *yes*
35. REQUIRED EQUIPMENT. The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132. *yes*

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COMPLETE

36. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittee shall test and maintain the equipment specified in condition 35 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133) *yes*
37. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134. *yes*
38. REQUIRED AISLE SPACE. The Permittee shall maintain aisle space as required by 35 IAC 724.135. *yes*
39. ARRANGEMENTS WITH LOCAL AUTHORITIES. The Permittee shall attempt to make emergency response arrangements with State and local authorities as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record. *yes*

CONTINGENCY PLAN

40. IMPLEMENTATION OF PLAN. The Permittee shall immediately comply with the provisions of the approved contingency plan and follow the emergency procedures described in 35 IAC 724.156 whenever there is a fire, explosion, or release of hazardous waste or constituents which threaten human health or the environment. 35 IAC 724.151(b) *yes*
41. COPIES OF PLAN. A copy of the contingency plan must be maintained at the facility and submitted to local response teams as required by 35 IAC 724.153. *yes*
42. AMENDMENTS TO PLAN. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154. *yes*
43. EMERGENCY COORDINATOR. A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155. *yes*

MANIFEST SYSTEM RECORD KEEPING AND REPORTING

44. MANIFEST SYSTEM. The Permittee shall comply with the manifest requirements of 35 IAC 724.171, 724.172 and 724.176. *yes*
45. OPERATING RECORD. The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173. *yes*

*IN
COMPLIANCE*

46. ANNUAL REPORT. The Permittee shall prepare and submit an annual report to the Agency prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175. *YES*

CLOSURE

47. PERFORMANCE STANDARD. The Permittee shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan. *N/A*
48. AMENDMENT TO CLOSURE PLAN. The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
49. NOTIFICATION OF CLOSURE. The Permittee shall notify the Agency at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
50. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
51. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure (35 IAC 724.214) plan.
52. CERTIFICATION OF CLOSURE. When closure is completed, the Permittee shall submit certification to the Agency in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.
53. COST ESTIMATE FOR FACILITY CLOSURE. The Permittee's original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:
- a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year.
 - b. Revised whenever there is a change in the facility's closure plan increasing the cost of closure.
 - c. Kept on record at the facility and updated. (35 IAC 724.242)

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54. FINANCIAL ASSURANCE FOR FACILITY CLOSURE. The Permittee shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Agency pursuant to 35 IAC 724.243. *N/A*
55. LIABILITY REQUIREMENTS. The Permittee shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
56. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS. The Permittee shall comply with 35 IAC 724.248 whenever necessary.

IN COMPLIANCE

ATTACHMENT B
REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
CONTAINER STORAGE		
G.1	Notify Agency of closure.	Within 180 days of the expected date of closure. <i>N/A</i>
G.1	Submit soil sampling and analysis plan for review.	At least 180 days prior to commencement of closure.
G.4	Submit application for modification of permit and post-closure care plan.	Within 30 days after determination that the container storage areas must be closed as a landfill.
G.6	Submit certification for closure of the container storage areas.	Within 60 days after closure of the storage areas is complete.
H.1	Notify Agency that the new container storage building has been constructed	Within 6 months of the effective date of this permit.
STANDARD CONDITIONS		
6	Complete application for new permit.	At least 180 days prior to permit expiration. <i>yes</i>
11	Information requested by Agency and copies of records required to be kept by this permit.	Reasonable time. <i>yes</i>
14	Notify Agency of planned physical alterations or additions.	At least 15 days prior to planned change. <i>yes</i>

- 15 Notify Agency of any planned changes which may result in permit noncompliance. Prior to the change. *N/A*
- 16 Application for permit modification indicating permit is to be transferred. Prior to transfer. *N/A*
- 18 Submission of any information required in a compliance schedule. Within 14 days after each schedule *N/A* date.
- 19 Report to Agency any non-compliance which may endanger health or environment. *N/A*
telephone
Within 24 hours after discovery.
in writing
Within 5 days after discovery.
- 20 Report all other instances of noncompliance. March 1 of each year *N/A* along with Annual Report.
- 27 Notify Agency in writing of expected receipt of hazardous waste from foreign source. At least 4 weeks *N/A* prior to receipt of waste.
- 40 Implementation of Contingency Plan. *N/A*
Notify appropriate state and local agencies with designated response roles. As needed.
Notify appropriate local officials. Immediately, if emergency coordinator's assessment indicates evacuation of local area is advisable.
Notify the Agency (217/782-3637) or Illinois ESDA (217/782-7860) if emergency coordinator determines there has been a release, fire or explosion which could threaten human health or the environment, outside the facility. Immediately after determination made.

IN COMPLIANCE

Notify Agency and appropriate state and local authorities, in writing that facility is in compliance with 35 IAC 264.156(h).

Prior to resuming operation in affected areas.

Report to Agency details regarding incident which required implementation of contingency plan.

Within 15 days after event.

46 Submit annual report required by 35 IAC 724.175.

March 1 of each year.

48 Application for permit modification amending closure plan.

49 Notify Agency that expecting to close.

At least 180 days prior to beginning closure.

53(a) Adjust closure cost estimate for inflation.

Within 30 days after anniversary date.

53(b) Revision of closure cost estimate.

As needed.

54 Change in financial assurance mechanism for closure.

At least 90 days prior to the change.

55 Change in coverage for sudden and non-sudden accidental occurrences.

At least 90 days prior to the change.

56 Notify Agency of commencement of voluntary or involuntary bankruptcy proceedings.

Within 10 days after commencement of proceeding.

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ATTACHMENT C

ATTACHMENT D-1

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

The hazardous waste management unit (identify unit) at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Illinois
Registration Number

Date

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
			NOTE: If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <u>N/A</u>					

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Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
OIH	1				Section 725.111: USEPA Identification Number	X			
					Has the facility obtained a USEPA identification number?			X	
OTH	1				Section 725.112: Required Notices				
			a		Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A <u>X</u>				
			b		Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A <u>X</u>				
OTH	1				Section 725.113: General Waste Analysis	X			
			a1		Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <u>X</u> No ____				Contained in PART B.

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Area	Class	90 Day F-U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				Contained in PART B
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <u>X</u> No <u> </u></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <u>X</u> No <u> </u></p> <p>2) The test methods which will be used to test for those parameters? Yes <u>X</u> No <u> </u></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <u>X</u> No <u> </u></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <u>X</u> No <u> </u></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <u> </u> No <u> </u> <u>N/A</u> <u>X</u></p>				<p>Once per year See Waste Disposition Form</p> <p>No off site waste Accepted.</p>

TSD-B-3

Area	Class	90 Day F.U. Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - <u>725.414 (Incinerators);</u> - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes _____ No <input checked="" type="checkbox"/></p>				
OTH	1	X				<input checked="" type="checkbox"/>			

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b	<p>Does a non-exempt facility have either:</p> <p>1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements	<input checked="" type="checkbox"/>			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b2	Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b4	Does the schedule specify at least the following minimum inspection frequency:				
				- Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - 725.274 (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>- A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec			Yes	No		
					<p>B) Key parameters for automatic waste feed cutoff systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

→ kept at each site.

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1	X			2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					e Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes				
					a Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					a Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	<p>Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			b	<p>Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:</p> <ol style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-8-11

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes _____ No _____ N/A <u>X</u>			X	
					NOTE: A "Yes" answer is a violation of the location standard.				

TSD-B-12

Area	Class	90 Day F.U. Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X			Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

TSD-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	<ul style="list-style-type: none"> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
			d	<ul style="list-style-type: none"> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p> <p>Section 725.133: Testing and Maintenance of Equipment</p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p>				

TSD-C-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?	<input checked="" type="checkbox"/>			
OTH	2			Section 725.137: Arrangements with Local Authorities a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	<input checked="" type="checkbox"/>			

TSD-C-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>Olin also has a Full-time Fire Dept, but has a Mutual Aid Agreement with local fire Dept.</p>

TSD-C-4

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	1				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Con- tingency Plan	X			
					a Is a plan available? Yes <u>X</u> No <u> </u> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazard- ous waste constituents to air, soil, or surface waters? Yes <u>X</u> No <u> </u> b Have the provisions of the plan been carried out immedi- ately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <u>X</u> No <u> </u> N/A <u> </u>				
OTH	2				Section 725.152: Content of Contingency Plan a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <u>X</u> No <u> </u> 2) Explosions? Yes <u>X</u> No <u> </u>	X			

TSD-D-1

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr		Yes	No		
			Sub Sec					
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				<i>→ maintained at each site.</i>
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 725.153: Copies of Contingency Plan				
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-D-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: a 1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b 2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d 4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> e 5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	2				Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	X			<p><i>Releases have been reported, responded to and then written reports submitted as required</i></p>

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes ____ No <input checked="" type="checkbox"/> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility:			<input checked="" type="checkbox"/> <i>Facility uses Manifests for shipments with their site. Manifests must travel along some public roads so waste is manifested.</i>	
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ____ No ____				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ____ No ____ N/A ____				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes ____ No ____				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ____ No ____				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ____ No ____				

TSD-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes _____ No _____ N/A _____</p> <p>Does the facility initiate shipments of hazardous waste? Yes _____ No _____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>			X	
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes _____ No _____</p>				
			d	<p>If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes _____ No _____</p>				

TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record	<input checked="" type="checkbox"/>			
			a	Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Does the operating record contain the following information:				
			1)	A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			2)	A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			3)	The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			4)	The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			5)	For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-E-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> - 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.325 (Surface Improvements)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.352 (Waste Piles)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.373 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.441 (Incinerators)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.475 (Thermal Treatment)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.502 (Chem., Phys., Bio. Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-E-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.376 (Land Treatment)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.378 (Land Treatment)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				

TSD-E-5

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 725.174: Availability, Retention and Disposition of Records				
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <ul style="list-style-type: none"> - The Agency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-E-6

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				Section 725.175: Annual Report	<input checked="" type="checkbox"/>			
					Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
OTH	1				Section 725.176: Unmanifested Waste Report			<input checked="" type="checkbox"/>	
					Does the facility accept hazardous waste from off-site? Yes _____ No _____				
					NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
					Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes _____ No _____				
					Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes _____ No _____				
					NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
					Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes _____ No _____				

TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste?</p> <p>Yes ____ No ____</p>	X			
				<p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>				
			a	<p>1) Releases, fires, explosions as specified in Section 725.156?</p> <p>Yes <u>X</u> No ____ N/A ____</p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194?</p> <p>Yes ____ No ____ N/A <u>Not inspected</u></p>				
			c	<p>3) Facility closure as specified in Section 725.215?</p> <p>Yes ____ No ____ N/A <u>X</u></p>				

TSD-E-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				<i>Surface impoundment going through extended closure.</i>
			a	Section 725.212: Closure Plan Was the most current facility closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				

TSD-G/H-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		a	<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A <input checked="" type="checkbox"/> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A <input checked="" type="checkbox"/> 				
				Section 725.218: Post-Closure Plan Was the most current facility post-closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No ____	<input checked="" type="checkbox"/>			
				Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
FIN	1			Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility?	<input checked="" type="checkbox"/>			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?	<input checked="" type="checkbox"/>			
NOTE: If no post-closure plan, mark "N/A".								

TSD-G/H-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	X			
OTH	1	X		Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	X			
OTH	1	X		Section 725.273: Management of Containers a Are containers of hazardous waste always closed during storage? Yes X No ____ b Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes X No ____	X			
OTH	2			Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes X No ____	X			

TSD-I-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	/			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>			X	

TSD-I-2

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If "No", skip Subpart J. <u>NOTE:</u> Tanks or sump pits that serve as part of a second- ary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <u>NOTE:</u> Failing the filter test means that the waste contains free liquids. Section 725.291: Assessment of Existing Tank Systems For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input type="checkbox"/> No <input type="checkbox"/> <u>NOTE:</u> Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				
									Tanks has secondary containment provided.

TSD-J-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____ <p>Section 725.292: Design and Installation of New Tank Systems or Components</p>				
			a	<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ____ No ____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes ____ No ____ 				

TSD-J-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____				
				Section 725.293: Containment and Detection of Releases				
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes _____ No _____ N/A <u>X</u>				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A <u>X</u>				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <u>X</u> No _____ N/A _____				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes _____ No _____ N/A _____				
			<u>or</u>					
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes _____ No _____ N/A <u>X</u>				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____				

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				<p>Located over containment which drains to sump which is part of the Facilities NPDES unit system</p>
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

TSD-J-4

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			i		Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-J-5

Area	Class	90 Day F.U. Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements b1&2 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
OTH	2			Section 725.295: Inspections c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

TSD-J-6

Area	Class	90 Day F U Rev	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes ____ No ____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes ____ No ____</p> <p><u>NOTE: Reporting to the Agency is not necessary if less than one pound of material which was immediately contained and cleaned up was spilled.</u></p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____</p> <p><u>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</u></p>				

TSD-J-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ____ No ____ N/A ____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ____ No ____ N/A ____</p> <p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>			X	
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ____ No ____</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ____ No ____</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ____ No ____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

TSD-J-8

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are ignitable or reactive wastes stored in tanks? Yes ____ No ____</p> <p>NOTE: If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ____ No ____</p> <p>NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes ____ No ____</p>			X	
OTH	1			<p>Section 725.299: Special Requirements for Incompatible Wastes</p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ____ No ____ N/A ____</p>			X	

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:	X			Stores use specific waste stream.
			a 1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____ or b 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____ NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.					

TSD-J-10

Area	Class	90 Day F-U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart K: Surface Impoundments Section 725.321: Design Requirements			X	Extended delay closure being pursued for this unit to allow continued use for nonhazardous wastewater while ground water monitoring occurs. Since surface compound is not being used for hazardous waste this section is not being completed. The facility is monitoring daily inspections to ensure sufficient freeboard is maintained.
					a Has the owner or operator met the requirements for liners and leachate collection systems in accordance with 35 Ill. Adm. Code 724.321(c) for each new unit, or lateral expansion of an existing unit, that is within the area identified in the facility Part A permit application? Yes ____ No ____ N/A ____				
					NOTE: If "N/A" is checked, provide a detailed explanation of why the site is not subject to the requirements, or why the requirements have been waived by the Agency pursuant to 725.321(c) or (d) and skip to 725.322. a Did the owner or operator meet the above requirement for waste received after May 8, 1985? Yes ____ No ____				
OTH	1	X			b Has the owner or operator notified the Agency, in writing, at least 60 days prior to receiving waste? Yes ____ No ____				
					b Did the owner or operator submit a Part B permit application within six months of the Agency's receipt of notification? Yes ____ No ____				
OTH	1	X			Section 725.322: General Operating Requirements				
					b Does the owner or operator make the claim that a free board of less than two feet may be maintained in the surface impoundment? Yes ____ No ____				

TSD-K-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart L: Waste Piles Section 725.351: Protection from Wind Is the waste pile subject to dispersal by the wind? Yes ____ No ____ NOTE: If the answer is "Yes", complete the rest of this section. If "No", then check "N/A" and describe why the pile is not subject to wind dispersal in the Remarks. Is the owner or operator: 1) Covering the pile to control dispersal? Yes ____ No ____ N/A ____ OR 2) Managing the pile by some other means to control dispersal? Yes ____ No ____ N/A ____ NOTE: If the answer to 2 is "Yes", explain in detail the "other means" being used to control dispersal.			X	No waste piles on the site. This site is pursuing closure of piles which were there in site in 1981-1982. Since no waste in piles at this facility this section is not completed.
OTH	1				Section 725.352: Waste Analysis a1 Are the only wastes the facility receives which are amenable to piling compatible with each other? Yes ____ No ____				

TSD-L-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart 0: Incinerators Section 725.440: Applicability b If the owner or operator claims to be exempt from the requirements of this subpart, except for Section 725.451 (closure), has he documented in writing (and has he retained at the facility this documentation) that the waste to be burned is identified in 725.440(b) and that it would not reasonably be expected to contain any of the hazardous constituents listed in 35 Ill. Adm. Code 721, Appendix H? Yes _____ No <u>X</u>				
			a	NOTE: If the answer is "No", the facility is regulated under this Subpart. Section 725.441: Waste Analysis Has the owner or operator obtained analyses of wastes prior to the first time they are burned in the incinerator to enable him to establish steady state operating conditions and to determine the types of pollutants which might be emitted? Yes <u>X</u> No _____ Does the waste analysis include at least: 1) Heating value of the waste? Yes <u>X</u> No _____				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b	2) Halogen and sulfur content of the waste? Yes ____ No ____ <i>N/A</i> <input checked="" type="checkbox"/>				
			c	3) Lead and mercury content of the waste? Yes <input checked="" type="checkbox"/> No ____ <i>N/A</i> ____				
			c	4) Written documented data to show that the waste does not contain lead or mercury? Yes ____ No ____ <i>N/A</i> <input checked="" type="checkbox"/>				
OTH	1	X		Section 725.445: General Operating Requirements Are wastes fed to the incinerator only when it is at steady state (normal) conditions of operation, including temperature and air flow?	<input checked="" type="checkbox"/>			
OTH	1			Section 725.447: Monitoring and Inspections Is the owner or operator conducting the following monitoring and inspections when incinerating hazardous waste:	<input checked="" type="checkbox"/>			
			a	1) Existing instruments which relate to combustion and emission control every 15 minutes? Yes <input checked="" type="checkbox"/> No ____				
			b	2) The complete incinerator and associated equipment for leaks, spills, and fugitive emissions once <i>a</i> day? Yes <input checked="" type="checkbox"/> No ____				
			b	3) All emergency shutdown controls and systems alarms to assure proper operations at least once <i>a</i> day? Yes <input checked="" type="checkbox"/> No ____				

Area	Class	90 Day F.U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<p>Section 725.451: Closure</p> <p>NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.</p> <p>Have all hazardous wastes and hazardous waste residues (including, but not limited to, ash, scrubber waters and scrubber sludges) been removed from the incinerator at the completion of closure?</p>			X	
OTH	1			<p>Section 725.452: Interim Status Incinerators Burning Particular Hazardous Wastes</p> <p>a Prior to burning hazardous waste numbers F020, F021, F022, F023, F026 or F027, has the owner or operator received a certification from the Agency that they meet the performance standards of 35 Ill. Adm. Code 724, Subpart 0, and have followed the procedures in 725.452(b)(1)?</p>			X	

TSD-0-3

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart Q: Chemical, Physical and Biological Treatment Section 725.500: Applicability Is the chemical, physical or biological treatment being done in other than: 1) Tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Surface impoundments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Land treatment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer to all of the above is "Yes", complete this Section. Chemical, physical and biological treatment of hazardous waste in tanks, surface impoundments and land treatment facilities is regulated under 35 Ill. Adm. Code 725 (724), Subparts J, K, and M, respectively.				
				Section 725.501: General Operating Requirements a Is the chemical, physical or biological treatment of hazardous waste in compliance with Section 725.117(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Are only hazardous waste treatment reagents being placed in the treatment process or equipment which will not cause the treatment process or equipment to rupture, leak, corrode, or otherwise fail before the end of its intended life? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	X			Hammer mills used to treat primary Ulin Subpart A waste PART A withdrawal request as they claim material is non-hazardous. However they are maintaining all 725 requirements until request is approved by the Agency.

TSD-Q-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1		c	<p>Where hazardous waste is continuously fed into a treatment process or equipment, is the process or equipment equipped with a means to stop this inflow? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>Section 725.502: Waste Analysis and Trial Tests</p> <p>Prior to using the treatment process or equipment to chemically, physically or biologically treat a hazardous waste, which is substantially different from waste previously treated in a treatment process or equipment; or a substantially different process from any previously used at the facility is used to chemically treat hazardous waste, has the owner or operator:</p> <p>b1 1) Conducted waste analyses or trial tests? Yes ____ No ____ N/A ____</p> <p style="text-align: center;">OR</p> <p>b2 2) Obtained written documented information on similar treatment of similar waste under similar operating conditions? Yes ____ No ____ N/A ____</p> <p>Section 725.503: Inspections</p> <p>a Is the owner or operator inspecting, where present:</p> <p>1) Discharge control equipment and safety equipment at least once each operating day to ensure it is in good working order? Yes ____ No ____ N/A ____</p>			<input checked="" type="checkbox"/>	All material is like in natural. Scrap primer.
OTH	1/2							

TSD-Q-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		b	2) Data gathered from monitoring equipment at least once each operating day to ensure that the treatment process or equipment is being operated according to its design? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	3) The construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	4) The construction materials of, and the area immediately surrounding, discharge confinement structures at least weekly to detect erosion or obvious signs of leakage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspection, the date of the last inspection, etc., to determine if inspections are actually being done.</p> <p>Section 725.504: Closure</p> <p>NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.</p> <p>Have all hazardous wastes and hazardous waste residues been removed from treatment processes or equipment, discharge control equipment and discharge confinement structures at the completion of closure?</p>					

TSD-Q-3

Area	Class	90 Day F.U. Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				Section 725.505: Special Requirements for Ignitable or Reactive Wastes a Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in the treatment process or equipment so that: 1) The resulting waste, mixture and dissolution of material no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> AND 2) Section 725.117(b) is complied with? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> OR b Is the waste treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			<i>Purpose of hammermill is to detonate scrap primer.</i>
OTH	1				Section 725.506: Special Requirements for Incompatible Wastes Is the owner or operator complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?			<input checked="" type="checkbox"/>	

Area	Class	Sub St	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>PART 728 LAND DISPOSAL RESTRICTIONS</p> <p>Section 722.111(d) - Waste Identification (Information Only)</p> <p>1. Does the facility handle the following wastes?</p> <p>a. F001 through F005 spent solvents Yes <u>X</u> No <u> </u> List* <u>F002, F003</u></p> <p>b. Dioxin-containing wastes Yes <u> </u> No <u>X</u> List* <u> </u></p> <p>c. California List wastes Yes <u>X</u> No <u> </u> List* <u>see third, third</u></p> <p>d. First, Second and Third Third wastes Yes <u>X</u> No <u> </u> List* <u>DC01, DC09, DC08, K046, F006-F009</u></p> <p>*List waste if room allows or attach Appendix A.</p> <p>2. Does the facility handle the following wastes (National Capacity Variances)?</p> <p>a. F001-F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date - 11/8/90). Yes <u> </u> No <u>X</u></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/8/90).</p> <p>Yes _____ No <u>X</u></p> <p>c. California List contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/8/90).</p> <p>Yes _____ No <u>X</u></p> <p>d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052 or K071 (effective date - 8/8/90).</p> <p>Yes _____ No <u>X</u></p> <p>e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103 and K104 (effective date - 8/8/90).</p> <p>Yes _____ No <u>X</u></p> <p>f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 6/8/91)</p> <p>Yes _____ No <u>X</u></p>				

Area	Class	Sub Se	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.															
				YES	NO																	
			<p>Section 728.107 - Waste Analysis Treatability Group - Treatment Standards Identification)</p> <p>F-solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?</p> <p>Yes <u>Y</u> No <u> </u> N/A <u> </u></p> <p>If yes, check the appropriate treatability group.</p> <p><u> </u> Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight).</p> <p><u>X</u> All other spent solvent wastes.</p> <p>First, Second and Third Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?</p> <p>Yes <u>X</u> No <u> </u> N/A <u> </u></p> <p>If yes, list the waste code and check the correct treatability group.</p> <table border="0"> <thead> <tr> <th><u>Waste Code</u></th> <th><u>Wastewater*</u></th> <th><u>Non-Wastewater</u></th> </tr> </thead> <tbody> <tr> <td><u>F006 - 09</u></td> <td><u>X</u></td> <td><u>X</u></td> </tr> <tr> <td><u>K046</u></td> <td><u>X</u></td> <td><u>X</u></td> </tr> <tr> <td><u>0001, 0008</u></td> <td><u> </u></td> <td><u>X</u></td> </tr> <tr> <td><u>0007</u></td> <td><u> </u></td> <td><u> </u></td> </tr> </tbody> </table> <p>* less than 1% TOC by weight and less than 1% filterable solids.</p>	<u>Waste Code</u>	<u>Wastewater*</u>	<u>Non-Wastewater</u>	<u>F006 - 09</u>	<u>X</u>	<u>X</u>	<u>K046</u>	<u>X</u>	<u>X</u>	<u>0001, 0008</u>	<u> </u>	<u>X</u>	<u>0007</u>	<u> </u>	<u> </u>				<p>see discharge to treatment plant sludge shipped off-site</p>
<u>Waste Code</u>	<u>Wastewater*</u>	<u>Non-Wastewater</u>																				
<u>F006 - 09</u>	<u>X</u>	<u>X</u>																				
<u>K046</u>	<u>X</u>	<u>X</u>																				
<u>0001, 0008</u>	<u> </u>	<u>X</u>																				
<u>0007</u>	<u> </u>	<u> </u>																				

Area	Class	Sub S	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Section 728.142: Treatment Standards Expressed as Specified Technologies</p> <p>1) For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers or incineration?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>If yes, specify the method: _____</p> <p>1) For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>2) For hazardous waste that contains HOCs in total concentrations greater than or equal to 1000 mg/l or 1000 mg/kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of Part 724, Subpart 0 or Part 725, Subpart)?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Are the following non-wastewater forms of the following hazardous wastes incinerated in accordance with the requirements of 35 Ill. Adm. Code 724, Subpart 0 or 35 Ill. Adm. Code, Subpart 0 or burned in boilers or industrial furnaces as defined in 35 Ill. Adm. Code 720 in accordance with 35 Ill. Adm. Code 726: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, U058, U087, U221, U223?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>4) Are the following wastewater forms of the following hazardous wastes treated by carbon adsorption, incineration or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, U058, U087, U221, U223?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>If an alternative method is used, specify the method and state whether the facility has received approval from the Agency for an exemption from the incineration requirement:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Section 728.141 - Treatment Standards Expressed as Concentrations in <u>Waste Extract</u></p> <p>Does the generator mix restricted wastes with different treatment standards?</p> <p>Yes <input checked="" type="checkbox"/> No ____</p> <p>If yes, did the generator select the most stringent treatment standards (728.141(b))?</p> <p>Yes <input checked="" type="checkbox"/> No ____</p> <p>Section 728.143 - Treatment Standards Expressed as Concentrations in <u>Waste</u></p> <p>Does the generator mix restricted wastes with different treatment standards?</p> <p>Yes <input checked="" type="checkbox"/> No ____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>If yes, did the generator select the most stringent treatment standards (728.143(b))?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 728.107 - Waste Analysis</p> <p>Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:</p> <p>1) Knowledge of Waste Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>List the waste for which "applied knowledge" was used and describe the basis of the applied knowledge determination.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Was all supporting data retained on-site?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Total Constituent Analysis? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>List the waste for which total constituent analysis was used and provide the date of the last test, the frequency of testing and note any problems.</p> <p>_____</p> <p>_____</p> <p>_____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>3) TCLP? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>List the wastes for which TCLP was used and provide the date of last test, the frequency of testing and note any problems.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Section 728.132 - Waste Specific Prohibitions - California List Wastes</p> <p>Are the following hazardous wastes being land disposed:</p> <p>1) Liquid (*) hazardous wastes having a pH less than or equal to 2.0?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>2) Liquid (*) hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Liquid (*) hazardous wastes that are primarily water and contain HOCs in total concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>NOTE: The following hazardous wastes are prohibited from land disposal unless they are disposed of in a landfill or surface impoundment which has been granted a case-by-case extension pursuant to Section 728.105:</p> <p>1) Liquid hazardous wastes that contain HOC's in total concentration greater than or equal to 1000 mg/l and are not prohibited under Subsection a) 3); and</p> <p>2) Non-liquid hazardous wastes containing HOC's in total concentrations greater than or equal to 1000 mg/kg and which are not wastes described in Subsection 728.132(d).</p> <p>NOTE: The requirements of Subsections (a), (d) and (e) do not apply if:</p> <p>1) an adjusted standard has been granted by the Agency pursuant to a No-Migration Petition under Section 728.106; or</p> <p>2) a case-by-case extension has been granted by the Agency pursuant to Section 728.105; or</p> <p>3) the waste meets applicable treatment standards or where treatment standards are not specified, the waste is subject to a statutory prohibition.</p> <p>* Did the operator use the Paint Filter Liquids Test Method 9095 (pursuant to Section 720.111) to determine if the waste is a liquid?</p> <p>(NOTE: Wastes subject to a Nationwide Capacity Variance are not subject to this Section).</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.																					
				YES	NO																							
			<p>Is restricted waste treated or stored greater than the time limits specified in Section 722.134?</p> <p>Yes ____ No ____</p> <p>If yes, the TSD checklist must be completed.</p> <p>Section 728.107 - Waste Analysis</p> <p>1) A. Does the generator ship any waste that <u>exceeds</u> the treatment standards to an off-site <u>disposal</u> facility? <i>Treatment</i></p> <p>Yes <u>X</u> No ____ (If no, go to B)</p> <p>Does the generator ship any waste that <u>exceeds</u> the treatment standards to an off-site <u>disposal</u> facility? (NOTE: If yes, this is a violation of the LDR restrictions.)</p> <p>Yes ____ No <u>X</u></p> <p>If yes, identify the waste code and off-site treatment, storage or disposal facilities:</p> <table border="0"> <thead> <tr> <th>Waste Code</th> <th>Facilities</th> <th>Treat/ Store/Dispose</th> </tr> </thead> <tbody> <tr> <td><u>F002, D001</u></td> <td><u>S-K</u></td> <td><u>Treat</u></td> </tr> <tr> <td><u>F005</u></td> <td></td> <td></td> </tr> <tr> <td><u>K046, F009</u></td> <td><u>POC / Heritage</u></td> <td><u>Treat / Disposal</u></td> </tr> <tr> <td><u>D001</u></td> <td></td> <td></td> </tr> <tr> <td><u>D008</u></td> <td><u>POC</u></td> <td><u>Treat / Disposal</u></td> </tr> <tr> <td><u>D009</u></td> <td><u>TWI</u></td> <td><u>Treat</u></td> </tr> </tbody> </table> <p>Does the generator provide notification to the treatment or storage facility?</p> <p>Yes <u>X</u> No ____</p>	Waste Code	Facilities	Treat/ Store/Dispose	<u>F002, D001</u>	<u>S-K</u>	<u>Treat</u>	<u>F005</u>			<u>K046, F009</u>	<u>POC / Heritage</u>	<u>Treat / Disposal</u>	<u>D001</u>			<u>D008</u>	<u>POC</u>	<u>Treat / Disposal</u>	<u>D009</u>	<u>TWI</u>	<u>Treat</u>				<p>→ However 6 LDR notification where not retained at the site 728.107a)(6)</p>
Waste Code	Facilities	Treat/ Store/Dispose																										
<u>F002, D001</u>	<u>S-K</u>	<u>Treat</u>																										
<u>F005</u>																												
<u>K046, F009</u>	<u>POC / Heritage</u>	<u>Treat / Disposal</u>																										
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<u>D008</u>	<u>POC</u>	<u>Treat / Disposal</u>																										
<u>D009</u>	<u>TWI</u>	<u>Treat</u>																										

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.								
				YES	NO										
			<p>Does the notification contain the following?</p> <p>EPA Hazardous Waste Number(s) Yes <u>X</u> No <u> </u></p> <p>Applicable treatment standards and prohibition levels Yes <u>X</u> No <u> </u></p> <p>Manifest Number Yes <u>X</u> No <u> </u></p> <p>Waste Analysis Date (if available) Yes <u> </u> No <u>X</u> <u>0</u></p> <p>2) B. Does the facility ship any waste that <u>meets</u> the treatment standards to an off-site disposal facility?</p> <p>Yes <u> </u> No <u>X</u> If no, go to C).</p> <p>If yes, identify the waste code and off-site disposal facilities:</p> <table border="0"> <tr> <td><u>Waste Code</u></td> <td><u>Facility</u></td> </tr> <tr> <td><u> </u></td> <td><u> </u></td> </tr> <tr> <td><u> </u></td> <td><u> </u></td> </tr> <tr> <td><u> </u></td> <td><u> </u></td> </tr> </table> <p>Does the facility provide notification and certification to the disposal facility?</p> <p>Yes <u> </u> No <u> </u></p>	<u>Waste Code</u>	<u>Facility</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>				
<u>Waste Code</u>	<u>Facility</u>														
<u> </u>	<u> </u>														
<u> </u>	<u> </u>														
<u> </u>	<u> </u>														

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Does the notification contain the following:</p> <p>EPA Hazardous Waste Number(s) Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Applicable treatment standards and prohibition levels Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Manifest Number Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Waste Analysis Data (if available) Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Certification that the waste meets treatment standards (wording in 728.107(a)(2)(ii)) Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>3) C. Is the waste subject to a nationwide variance, case-by-case extension (728.105) or no migration petition (728.106)?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (If no, go to D)</p> <p>If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Does the notification contain the following information?</p> <p>EPA Hazardous Waste Number Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>The corresponding treatment standards and all applicable prohibitions Yes <input type="checkbox"/> No <input type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			Manifest Number Yes _____ No _____ Waste analysis data Yes _____ No _____ (if available) Date the waste is subject to the prohibitions Yes _____ No _____ 4) D) Does the facility generate any First, Second or Third Third "soft hammer" waste? Yes _____ No <u>n/a</u> X (If No, go to next section) Does the generator provide the following notifi- cation to the receiving facility with each shipment of waste? EPA Hazardous Waste Number Yes _____ No _____ Applicable prohibition Yes _____ No _____ (728.133(f), 728.134(h)) Manifest Number Yes _____ No _____ Waste Analysis Data Yes _____ No _____ (if available) Section 728.130 - Waste Specific Prohibitions - Solvent Wastes Section 728.131 - Waste Specific Prohibitions - Dioxin Containing Wastes Section 728.132 - Waste Specific Prohibitions - California List Wastes				

Area	Class	Sub Sec.	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.												
				YES	NO														
			<p>Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?</p> <p>Yes _____ No _____</p> <p>Did the unit meet the Minimum Technology Requirements (MTR) (i.e., double liner, leachate, collection system, groundwater monitoring)?</p> <p>Yes _____ No _____</p> <p>Treatment Using RCRA 264/265 Exempt Units or Processes</p> <p>Is waste treated in a RCRA 264/265 exempt unit(s) (i.e., boilers, furnaces distillation units, wastewater treatment tanks, elementary neutralization, etc.)?</p> <p>Yes <u>X</u> No _____</p> <p>List types of waste treatment units and processes:</p> <table border="1"> <thead> <tr> <th>Waste Code</th> <th>Type of Treatment</th> <th>Treatment Units and Processes</th> </tr> </thead> <tbody> <tr> <td>K046, F006-09 D008</td> <td>WWT</td> <td>WWT</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p>Are treatment residuals generated from these units?</p> <p>Yes <u>X</u> No _____</p>	Waste Code	Type of Treatment	Treatment Units and Processes	K046, F006-09 D008	WWT	WWT	_____	_____	_____	_____	_____	_____				
Waste Code	Type of Treatment	Treatment Units and Processes																	
K046, F006-09 D008	WWT	WWT																	
_____	_____	_____																	
_____	_____	_____																	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>If yes, the residues are subject to the LDR generator requirements.</p> <p>Are these residuals further treated, stored for greater than Section 722.134(a) allows or disposed on-site?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, the TSD checklist must be completed.</p> <p>Section 728.150 - Prohibitions on Storage of Restricted Wastes</p> <p>Are restricted wastes stored (greater than 90 days) on-site?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, are all containers:</p> <p>2) clearly marked to identify their contents and the date entering storage?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Are all tanks:</p> <p>2) clearly marked with a description of their contents, the quantity of wastes received, and date entering storage, or is such information recorded and maintained in the operating record?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>Site 1-11 (2) 55 gal Cyanide wastes Site 4-2(a) - (1) 55 gal of Closure wastes</p>

Area	Class	Sub Se	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Have wastes been stored for more than one year since applicable LDR regulations went into effect?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If yes, can the facility show that such storage is necessary to facilitate proper recovery, treatment or disposal?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If yes, state how: _____</p> <p>_____</p> <p>_____</p> <p>NOTE: Wastes that are the subject of a no-migration petition, a nationwide variance, a case-by-case extension or meet the treatment standards are not subject to the requirements of Section 728.150.</p> <p>Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:</p> <p>In a facility meeting the TSCA criteria in 40 CFR 761.65(b)?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>More than one year?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.								
				YES	NO										
			<p>Section 728.107 - Waste Analysis</p> <p>1) Does the facility treat restricted wastes other than in surface impoundments?</p> <p>Yes _____ No <u>X</u> (If no, go to 728.104 - Surface Impoundments)</p> <p>Describe the waste codes and treatment processes:</p> <table border="0"> <tr> <td><u>Waste Code</u></td> <td><u>Treatment Processes</u></td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> </table> <p>Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes?</p> <p>Yes _____ No _____</p> <p>Have treatment standards or prohibition levels been met?</p> <p>Yes _____ No _____</p> <p>NOTE: Treatment standards may be expressed as concentrations in the waste (728.107(b)(3)), concentrations in the waste extract (728.107(b)(1)) or combination of both (See Attachment B).</p> <p>2) Does the facility test the treatment residues in accordance with the requirements of Section 728.132(j) (Test methods for California List Wastes)?</p> <p>Yes _____ No _____</p>	<u>Waste Code</u>	<u>Treatment Processes</u>	_____	_____	_____	_____	_____	_____				<p><i>no waste treated to meet LDR treatment standards</i></p>
<u>Waste Code</u>	<u>Treatment Processes</u>														
_____	_____														
_____	_____														
_____	_____														

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Does the facility ship any waste or treatment residue to an off-site disposal facility?</p> <p>Yes ____ No ____</p> <p>If yes, does the treatment facility provide notification and certification to the disposal facility?</p> <p>Yes ____ No ____</p> <p>4) Does the notification contain the following?</p> <p>EPA Hazardous Waste Number(s) Yes ____ No ____</p> <p>Applicable treatment standards and prohibition levels Yes ____ No ____</p> <p>Manifest Number Yes ____ No ____</p> <p>Waste Analysis Data (if available) Yes ____ No ____</p> <p>5) Did the treatment facility submit a certification with each shipment of waste or treatment residue to the land disposal facility stating that the waste or treatment residue has been treated in compliance with the treatment standards specified in Subpart D and the prohibitions set forth in Section 728.132?</p> <p>Yes ____ No ____</p> <p>NOTE: Treatment standards may be expressed as a technology or concentration in waste or waste extract. Refer to 728.107(b)(5) for the type of certification required.</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>6) If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements of 728.107(a)(1)?</p> <p>Yes _____ No _____</p> <p><u>(NOTE TO ALL INSPECTORS: The May 8, 1990 deadline for the establishment of treatment standards for all Third Third wastes has been extended until August 8, 1990).</u></p>				

**APPENDIX I
Oversight Inspection Form**Instructions:

The form is divided into two parts. Part 1 is used during the actual inspection to record observations made in the field. Part 2 of the form is used to evaluate the State inspection report relative to field observations. Both parts of the oversight inspection report have to be completed by the EPA oversight inspector. In the remarks column, N/A may be appropriate in some instances.

PART 1I. Facility Name: Olin Corporation, Main plantEPA ID #: ILD 006 271 696

Facility

Activities: ☐ Small Quantity Generator☐ Generator☐ Transporter☒ Treatment/Storage/Disposal FacilityII. Inspection
Type: ☒

CEI

☐ O & M☐ CME☐ Lab Audit☐ Records Review☐ Compliance Monitoring☐ CDI☐ Other (specify) _____

Items To Be

Reviewed: ☐ Full Scope☒ Limited Scope

Inspection

Format: ☐ Joint☐ Independent

III. EPA Oversight

Inspector: ADENUGA JONATHANOrganization: U.S. ENVIRONMENTAL PROTECTION AGENCYTelephone: 6-7954

IV.

Inspection

Date(s): May 1, 1991

	Yes	No	Remarks
3. Did the inspector fail to note any violations or improper waste handling activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Did the inspector fail to identify any hazardous waste handling areas not previously identified in previous reports or records?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Upon identifying a potential violation, did the inspector initiate case development procedures (i.e., gather detailed evidence to support the findings of violations)?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
6. Did the inspector check the requirements for preparedness and prevention, including adequate aisle space, emergency equipment availability, and access to communications during hazardous waste handling operations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. If applicable, was sampling performed by State personnel in accordance with standard operating procedures specified by the State and/or EPA?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
8. Was proper safety and sampling equipment used to perform the sampling?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
9. Was the inspector helpful to the owner/operator by providing explanation of the regulations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Yes No Remarks or Not Applicable

VIII. Document Inspection (Review)

(Please note if review was performed prior to or during inspection)

1. Did the inspector thoroughly review the following documents?

A. For Generators:

-Inspection records for hazardous waste storage areas	<input checked="" type="checkbox"/>		
-Personnel training records	<input checked="" type="checkbox"/>		
-Contingency plan	<input checked="" type="checkbox"/>		
-Emergency equipment testing and maintenance records		<input checked="" type="checkbox"/>	
-Waste analysis records		<input checked="" type="checkbox"/>	
-Manifests and exception reports		<input checked="" type="checkbox"/>	The inspector asked for the manifests but did not review them
-State annual and/or EPA biennial reports		<input checked="" type="checkbox"/>	
-Waste minimization plan			NA

B. In addition, for TSDF's:

-Part A permit application or final issued permit		<input checked="" type="checkbox"/>	
-Part B application prior to permit issuance		<input checked="" type="checkbox"/>	
-Operating record	<input checked="" type="checkbox"/>		
-Waste analysis plan		<input checked="" type="checkbox"/>	
-Inspection schedule	<input checked="" type="checkbox"/>		
-Closure and Post Closure Plan		<input checked="" type="checkbox"/>	N/A
-Financial instruments			N/A
-Ground Water Monitoring/Reports			N/A
-Other information (treatment plant operations, internal correspondence)			

II. Remarks

1. What is your overall assessment of the inspection and the inspection report?

The inspection was thoroughly conducted even though the scope was limited. The inspector asked the right questions, reviewed the proper documents and performed his duties in a professional manner.

2. Describe recommendations that may improve the quality of the State inspection and/or inspection report?

NONE

NOTE: Indicate whether the inspector is in need of additional training or is lacking in a particular skill (e.g. hazardous waste sampling) needed for an adequate inspection.

3. Comments on the inspection that could have a bearing on the State inspector evaluation (e.g., facility status under litigation, inadequate time allocated to perform inspection, complex industrial processes and waste handling practices, or numerous regulated units located on site).

There is a need to clarify the status of the facility's Part B permit regarding several hazardous waste storage areas covered under the permit.

RCRA INSPECTION REPORT

USEPA #: IL D 006271696 IEPA #: 1190200002

Facility Name: Olin Corporation - Main Plant Phone #: _____

Street Address: 427 N. Shamrock St. County: Madison

City: East Alton State: Illinois Zip: 62024

Region: Southern Inspection Date: 05/14/90 From: 9:30 To: 12:45

Weather: 5/1/90 Sunny - 70° 5/3/90 Rain - 60°

TYPE OF FACILITY

Notified As: 6/T/TS D Regulated As: 6/T/TS D

LDF? Yes HPV? NO 90-Day F/U Required?: YES X NO _____

TYPE OF INSPECTION

CEI: X Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 08/18/80, from (Initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: 11/07/90 (TCLP)

Part A Withdrawal requested: 1/1/ Approved by (US) (IL) EPA: 1/1/

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 11/06/90 Final Permit Issued: 04/02/90

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N 1/1/

Illinois Attorney General: Y or N 1/1/ County State's Attorney: Y or N 1/1/

ORDERS ISSUED

CACO: 1/1/ CAFO: 1/1/ Consent Decree: RECEIVED

Federal Court Order: 1/1/ State Court Order: 1/1/ IPCB Order: 1/1/

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	IEPA/DLPC On Annual Report		
							1988	1989	1990
S01	Yes	N/A	Yes	No *	Yes	No	Yes	Yes	Yes
T01	Yes	N/A	Yes	No *	Yes	Some Exempt pursuant to 35.101(2)(b)	Yes	Yes	N/A
S03	Yes	N/A	Yes	Pursuing Closure	No	No	Not used since 1981-82		
T04	Yes	N/A	Yes	Pursuing Extended Closure	No	No	Not used since 1987		
T03	Yes	N/A	Yes	No	Yes	No	Yes	Yes	Yes
T04	Yes	N/A	Yes	N/A	Yes	Yes waste reclassified as Non-Hazardous	N/A	N/A	N/A

* Some of these units going through closure

Name	Olin Corporation		
Address	427 N. Shamrock St.		
City	East Aton		
State	Illinois	Zip	62024-1174
Phone #	618/258-5038		

Name	Same As Owner	
Address		
City		
State	Zip	
Phone #		

Mike Rourke
May Gail Scott
Bob Kaempfer

Manager Env. Affairs
Env. Engineer
Env. Engineer

618/258-5039
618/258-5712
618/258-5038

Ted Dreyer
Jonathan Abrams
Chris Cahovsky
Mike Grant

IEPA/Permits
USEPA/
IEPA/EP5
IEPA/EYS

217/382-4761
312/886-7954
618/341-5120
618/346-5120

Michael D Frost

TERA/ERS

PHONE #
618/346-5120

[illegible][illegible][illegible]

Facility Name: Ohio Corp. M. Plant
 USEPA #: IL D006271696
 IEPA #: 119020002

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #					On Annual Report for: (Circle if present; cross out if not present)					Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12					* On 3510.3								
			* On 8700-12					* On 3510.3								
			* On 8700-12					* On 3510.3								
WWT Sludge	Winchester Waste Water Treatment Plant at Enclave	3/12/91	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	20 cubic yds	16.4 cu yds / week	3/23/91 4/19/91	Perma Disposal Maritoye
Baghouse Dust	All Baghouse Waste	2/26/91	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	130 yds	1 cu yd / day	4/23/91	Perma Disposal Laurel as Substrate at Energy Substrate at Energy Substrate at
Plating Waste	Site 1-1 Bullet Plating	1/21/91	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	3 drums	5,000 lbs / year	4/25/91	Genachem Detent was discharged to Michigan River & West
Incinerator Ash	Base 3 Incinerator	1/23/91	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	250 yds	2,000 yds / year	4/17/91	Perma Disposal Co.
Turnbly Machine	Lead Contaminated Waste from Bullet Burying	5/10/90	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	1 yd	1 cu yd / year	3/11/91	Perma Disposal General Detent Laurel PA (Chesapeake)
Spent Solvents	Chassis, Cutting, Degreasing	4/17/90	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	2 drums	2,000 lbs / year	4/10/91	Perma Disposal Laurel PA (Chesapeake)
Bullitic Sand	Sand Contaminated Lead from Firing Range	2/18/91	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	1" O"	2,000 lbs / year	4/19/90	Perma Disposal
Mercury, Lead, Arsenic & Debris	Repair of Ammo. (See Remarks)	10/27/90	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	6 drums	2,000 lbs / year	2/15/91	TWT
Whole Parts, Machine	Safety-Kleen Parts Machine	Supplied by J&K	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A	4,000 yds / year	5/16/91	Safety-Kleen

* All "NO" responses must be explained in narrative.

1190200002 - Madison County
Olin Corp. - Main Plant
ILD006271696

REMARKS

Olin Corporation, located in East Alton, Illinois, has two manufacturing facilities referred to as the Winchester Group and the Brass Group. Small arms ammunitions, primer explosives, and other ammunition related products are manufactured by the Winchester Group. The Brass Group manufactures copper base alloy products. Regulated hazardous waste activities at this facility include storage in drums (S01), storage and treatment in tanks (S02, T01), storage in surface impoundments (S04), incineration (T03), and treatment in other devices (T04), i.e., hammermills and a rotary destruct furnace. Types of wastes generated are lead contaminated filters and baghouse dust, plating wastes, explosive wastes, wastewater treatment sludges, scrap ammo, incinerator ash, and spent solvents.

On April 2, 1990, a Part B permit was issued to Olin for container storage of Mercury Contaminated Ammo at Site 4-2(a). This permit became effective on May 5, 1990 and was revised April 22, 1991. The revision was made to include the storage of Mercury Contaminated Debris. However, the Part B permit was issued for a container storage building which, to date, has not been constructed. During this inspection, no mercury contaminated ammo or debris had been stored greater than 90 days. Since the facility's Part B permit was effective May 5, 1990 and condition H.1. of the permit states the facility shall construct the new container storage building within 6 months of the permit's effective date, the facility is currently not permitted to store Mercury Contaminated Ammo or Debris greater than 90 days. Interim Status for storage of this waste would have expired six months after the effective date of the permit. Since the unit permitted has not been constructed and the waste permitted has not been stored greater than 90 days, compliance with the Part B permit was not determined during this inspection.

The facility is also attempting to obtain a Part B permit for the two incinerators located at Zone 3-1. The Zone 3-1 incinerators are being operated to burn the following explosives containing hazardous wastes:

1. Primer Mix Scrap - Class A Explosive
2. Smokeless Powder scrap - Class B Explosive
3. Nitrocellulose Scrap - Ignitable Waste

In addition to these hazardous wastes, the facility will also incinerate combustible factory trash. This is the primary purpose of the two incinerators which generate steam through the use of two waste-heat boilers.

On April 18, 1991, the Agency approved the closure plans for the following units. Certification for these units is due by January 1, 1992.

Site 1-1: Bullet Plating Facility - The cyanide destruct unit system is regulated by the facility's NPDES permit and discharges to the Winchester wastewater treatment system. The waste cyanide storage area (S01) will be closed and operated under generator status. The Scrap Cyanide Treatment Tank (T01) will also be closed and operated pursuant to the generator regulations.

Site 1-2: Machine Shop Spent Solvent Storage (S01) - This unit has been eliminated.

Site 1-13: Shot Tower Medium - This lead contaminated media is stored in a roll-off container (S01). After closure, this site will be a 90 day accumulation point.

Site 1-14: Fabricating Spent Solvent Storage Area - This former spent solvent container storage area (S01) is no longer used.

Site 1-16: Solar Bond Spent Solvent Storage - This container storage area has also been taken out of service and will no longer be used.

Site 3-1: A tank referred to as the mix muller was used on a trial basis for fixation studies. Although the unit is currently not being used, after closure it may be used randomly under generator status.

Site 4-2(a): MRF General Storage - Four container storage areas were included in the closure plan submitted.

1. Fenced Storage Area - After closure, this area will be used for 90 days or less.
2. The Spent Solvent Storage Area will also be used as a 90 day accumulation point.
3. Two 40-foot semi trailers - They too will revert to generator status.
4. A dumpster was used to dewater the MRF sump sludge. This unit is no longer in use.

Site 4-3: Zone 4 Incinerator - This unit was shut down on November 7, 1989. The unit has been dismantled and disposed of.

Site 4-7: T-400 Spent Solvent Storage - This storage area has not been used since 1983.

The Zone 6 surface impoundment will also be closed, however, delayed closure is being proposed for this unit. This will allow Olin to continue using the impoundment for non-hazardous wastewater while groundwater monitoring will be on-going. Upon observation, the lagoon contained a small amount of rainwater. The facility continues doing daily inspections and employee training as it relates to the lagoon.

The following sites are regulated as 90 day accumulation points:

Site 1-9: Lab solvent which is placed in 55 gallon drums.

- Site 1-11: Sludge generated at the Winchester wastewater treatment plant is accumulated in roll-off boxes prior to shipment off-site.
- Site 1-12: Spent tumbling media (corn cobs) which was used to burnish bullets is collected in a roll-off box.
- Site 3-1: Incinerator ash is collected in roll-off boxes and baghouse dust is collected in 1 cy. bags. The dust had been used as a substitute for lime at the facility's wastewater treatment plant. This activity has been limited and most of the dust generated is shipped to an off-site disposal facility.
- Site 4-9: This site is also an accumulation point for lead contaminated tumbling media. The facility used to accumulate this waste in a roll-off container. This waste is now placed in plastic lined 1 cy. boxes.
- Site 4-8: This is a satellite accumulation area for spent chlorinated solvent.

The facility also has a closure plan in-house for waste piles which contained ballistic sands. These waste pile units have not been present at the facility since the early 1980's.

There are hammermills and a rotary destruct furnace which were classified as treatment units (T04). Olin submitted a request to have these units removed from their Part A. Olin maintains that the wastes are non-hazardous as they are no longer classified as explosives. However, the Agency has not acted upon this request. Therefore, Olin is maintaining all Interim Status requirements associated with these units until the Part A withdrawal is approved.

Several tanks (T01) were listed on the facility's Part A application. These tanks are referred to as kill sumps. The sumps collect explosive contaminated rinse/wastewater (K046). The wastes are rendered non-reactive and the sumps discharge to the sewer, or the waste is trucked to a holding tank at the Winchester WWTP. The tanks are considered part of the NPDES wastewater treatment system and are exempt, pursuant to Section 725.101(c)(10).

During the inspection of the facility, the following discrepancies were observed:

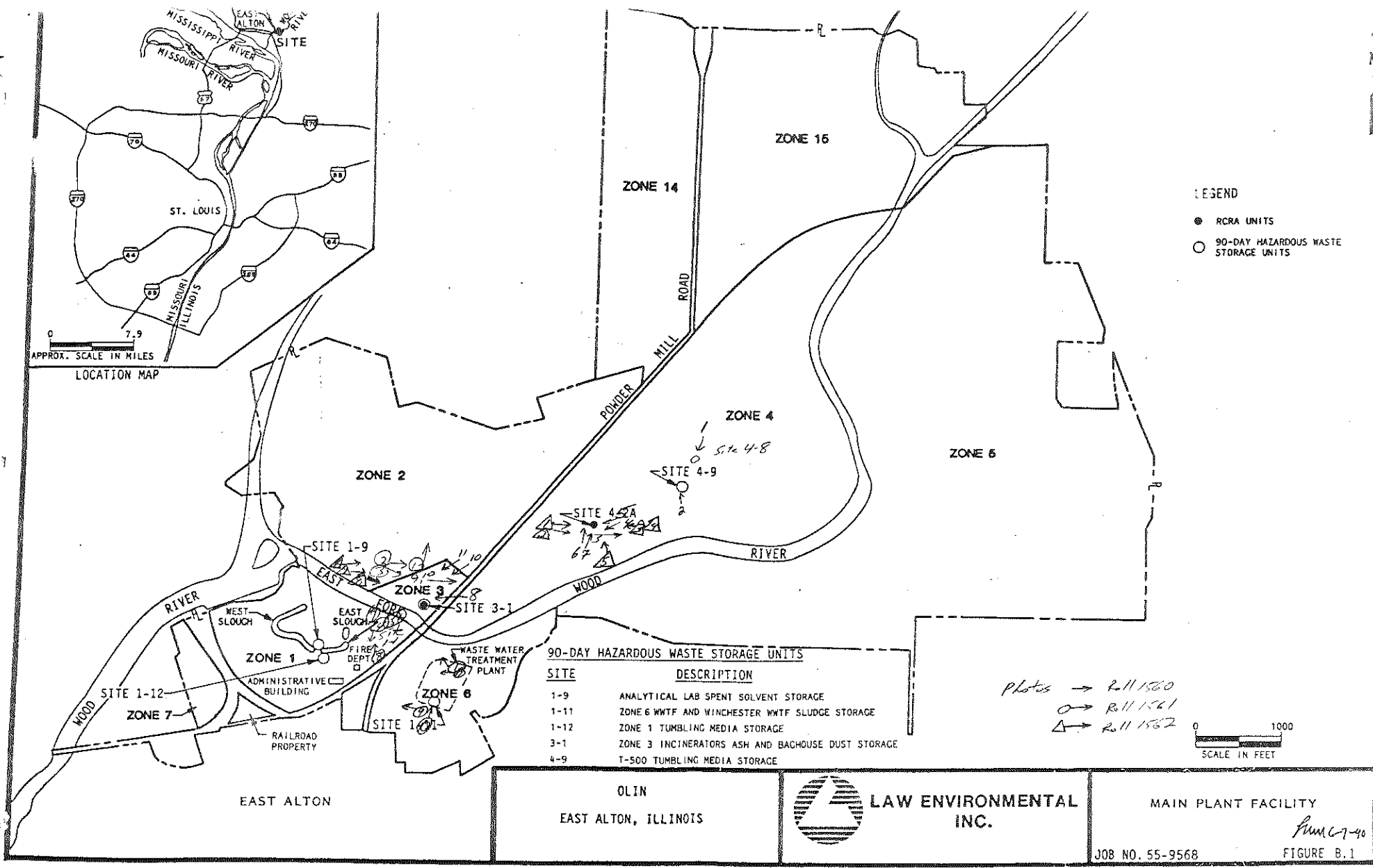
The containers of incinerator baghouse dust located at Zone 3-1 did not have sufficient aisle space maintained. This condition was observed on May 1, 1991. When I returned to the facility on May 3, 1991, the bags had been restaged in rows two wide and stacked two high. As a result, violation of Section 725.135 will not be alleged since this condition was rectified.

Several of the drums stored in the Site 4-2(a) fenced area were not labeled with the accumulation start dates. The two drums containing contaminated ammo were being accumulated for less than 90 days and should be dated, pursuant to Section 722.134(a)(2). Five drums of chromium contaminated heat treating salts which were being stored there also were not dated. Pursuant to Section 728.150(a)(2), drums in storage must be dated with the dates they were placed in storage. All other areas addressed during this inspection were being managed as required.

As a result, the following apparent violations were observed:

722.134(a)(2)
728.150(a)(2)

MDG:cas/0658L



JOB NO. 55-9568

FIGURE B.1

DATE: May 3, 1991

TIME: 9:30 - 12:15

I.D. 1190200002

Madison County

Olin - Main Plant Site 4-2A

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL# 1562 PHOTO# 1

PHOTOGRAPH BY:

Will V. [Signature]

DATE: May 3, 1991

TIME: 9:30 - 12:15

I.D. 1190200002

Madison County

Olin - Main Plant Site 4-2A

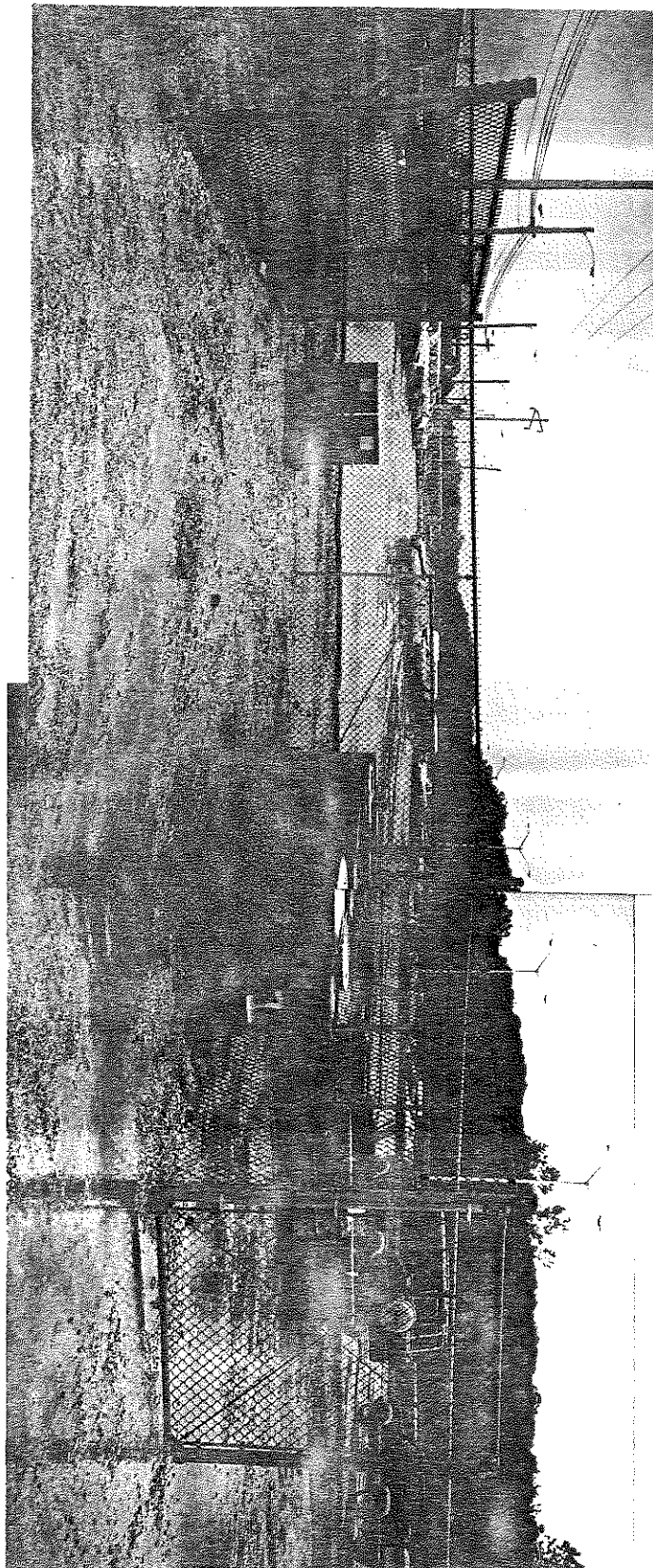
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East Southeast

ROLL# 1562 PHOTO# 2

PHOTOGRAPH BY:

Will V. [Signature]



DATE: May 3, 1991

TIME: 9:30 - 12:15

I.D. 1190200002

Madison County

Olin - Main Plant Site 4-2A

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1562 PHOTO# 3

PHOTOGRAPH BY:

J.M.D. [Signature]



DATE: May 3, 1991

TIME: 9:30 - 12:15

I.D. 1190200002

Madison County

Olin - Main Plant Site 4-2A

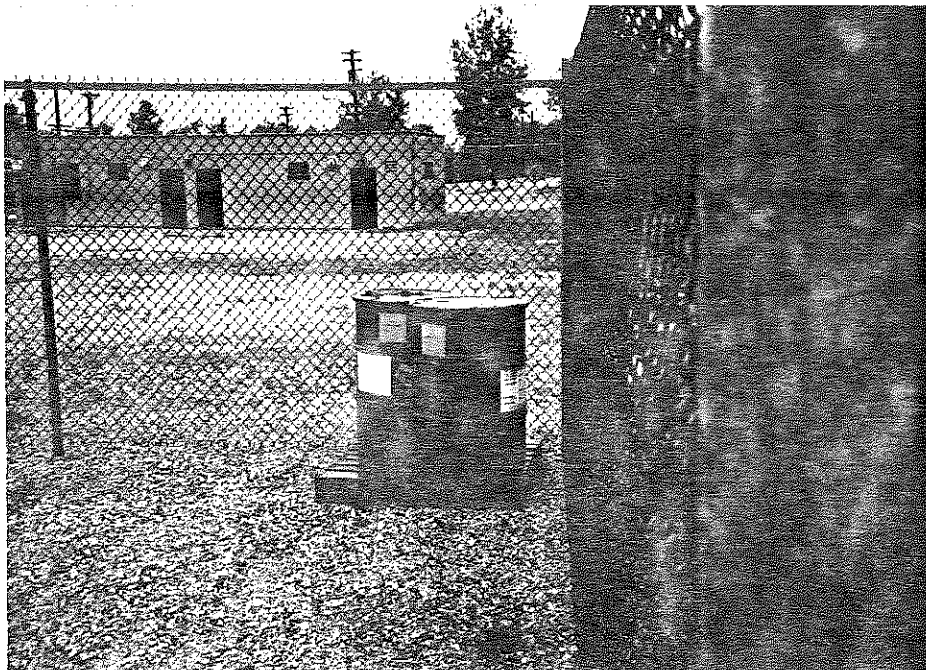
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ROLL# 1562 PHOTO# 4

PHOTOGRAPH BY:

J.M.D. [Signature]



DATE: May 3, 1991

TIME: 9:30 - 12:15

I.D. 1190200002

Madison County

Olin - Main Plant Site 4-2A

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 1562 PHOTO# 5

PHOTOGRAPH BY:

Will D. [Signature]



DATE: May 3, 1991

TIME: 9:30 - 12:15

I.D. 1190200002

Madison County

Olin - Main Plant Site 3-1

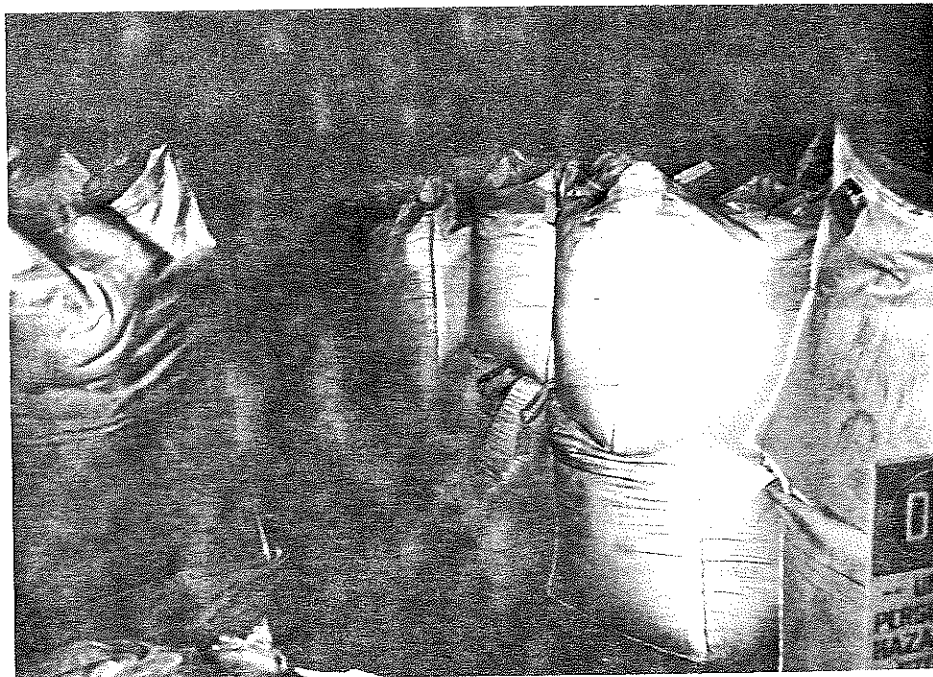
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Southeast

ROLL# 1562 PHOTO# 8

PHOTOGRAPH BY:

Will D. [Signature]



DATE: May 3, 1991

TIME: 9:30 - 12:15

I.D. 1190200002

Madison County

Olin - Main Plant Site 3-1

PHOTOGRAPH TAKEN TOWARD THE:

East Northeast

ROLL# 1562 PHOTO# 6

PHOTOGRAPH BY:

Will D. [Signature]

DATE: May 3, 1991

TIME: 9:30 - 12:15

I.D. 1190200002

Madison County

Olin - Main Plant Site 3-1

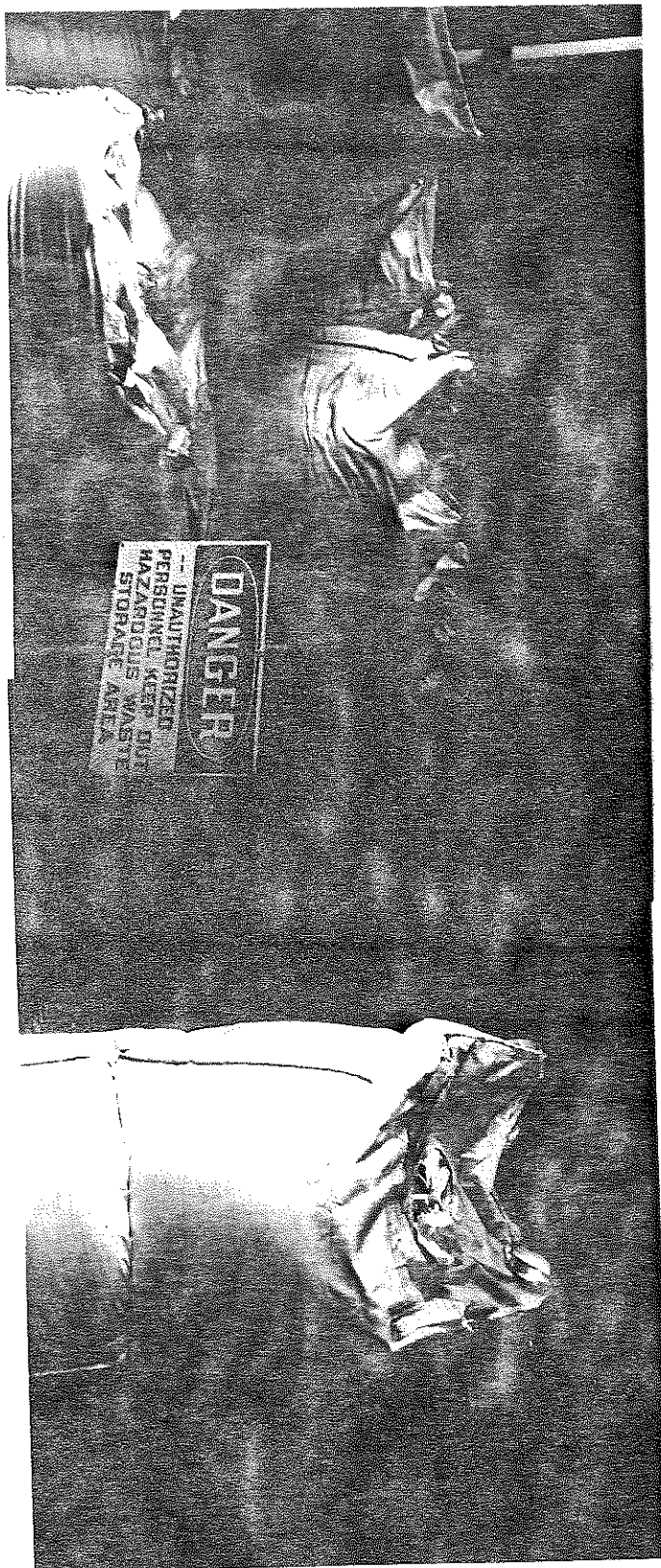
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East

ROLL# 1562 PHOTO# 7

PHOTOGRAPH BY:

Will D. [Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 4-8

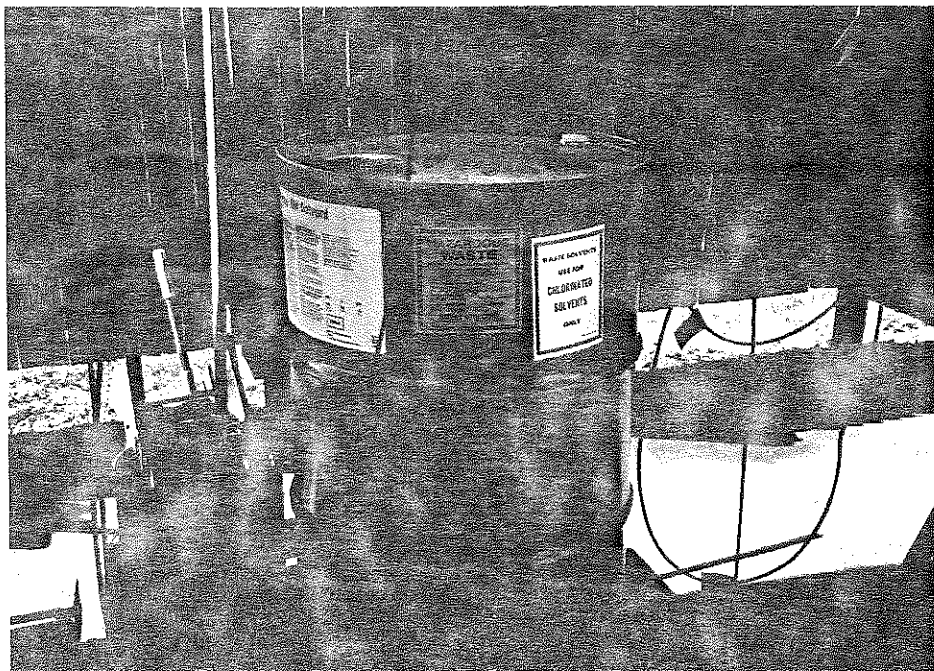
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South

ROLL# 1560 PHOTO# 1

PHOTOGRAPH BY:

[Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 4-9

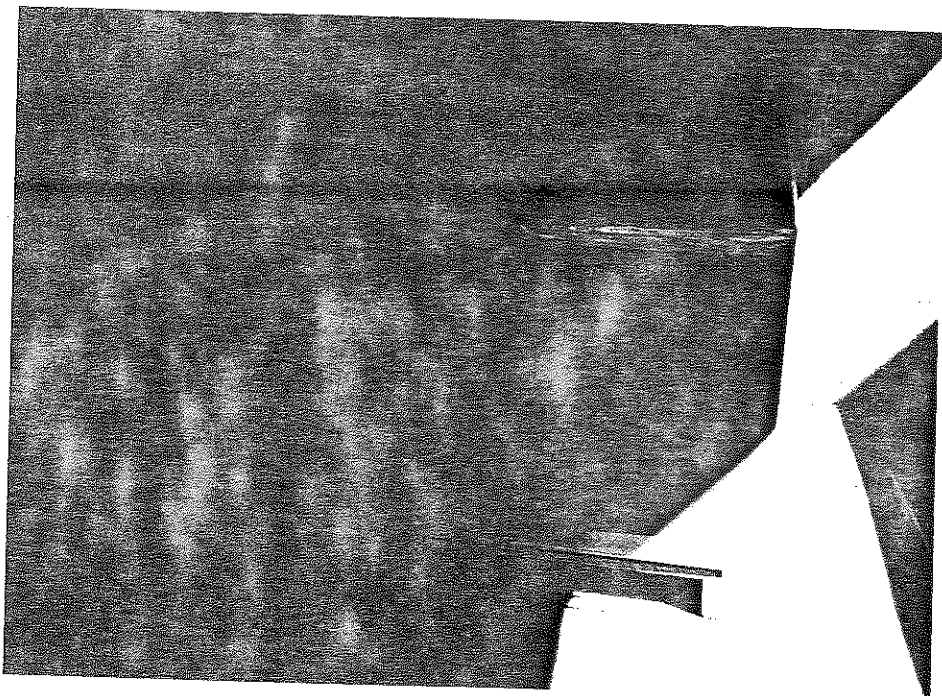
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ROLL# 1560 PHOTO# 2

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DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 4-2a

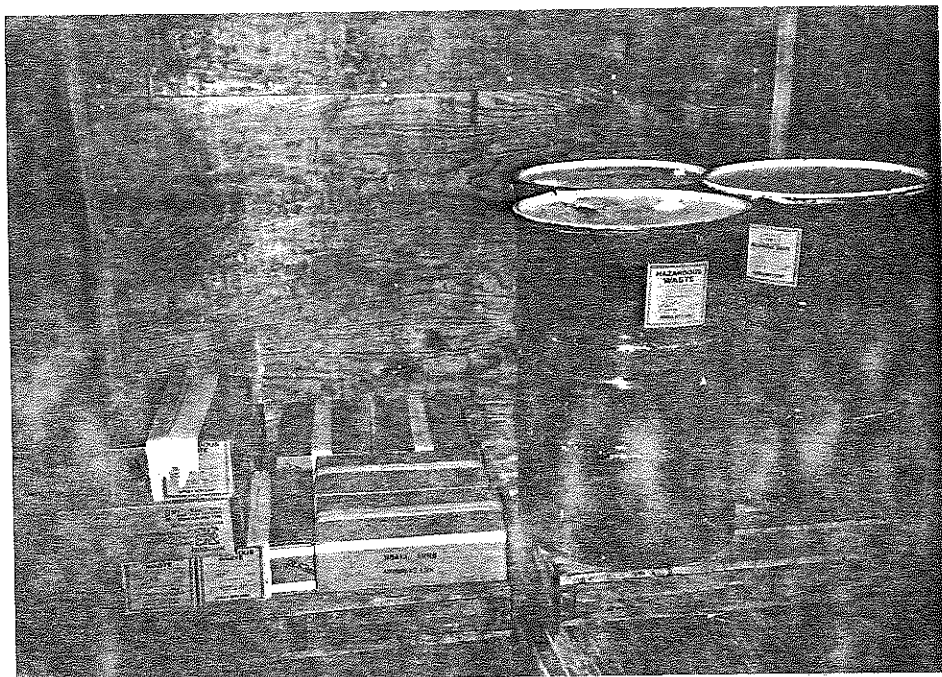
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East

ROLL# 1560 PHOTO# 3

PHOTOGRAPH BY:

W. D. D.



DATE:

TIME:

I.D.:

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 4-2a

PHOTOGRAPH TAKEN TOWARD THE:

South Southwest

ROLL# 1560 PHOTO# 4

PHOTOGRAPH BY:

Will D. [Signature]

DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 4-2a

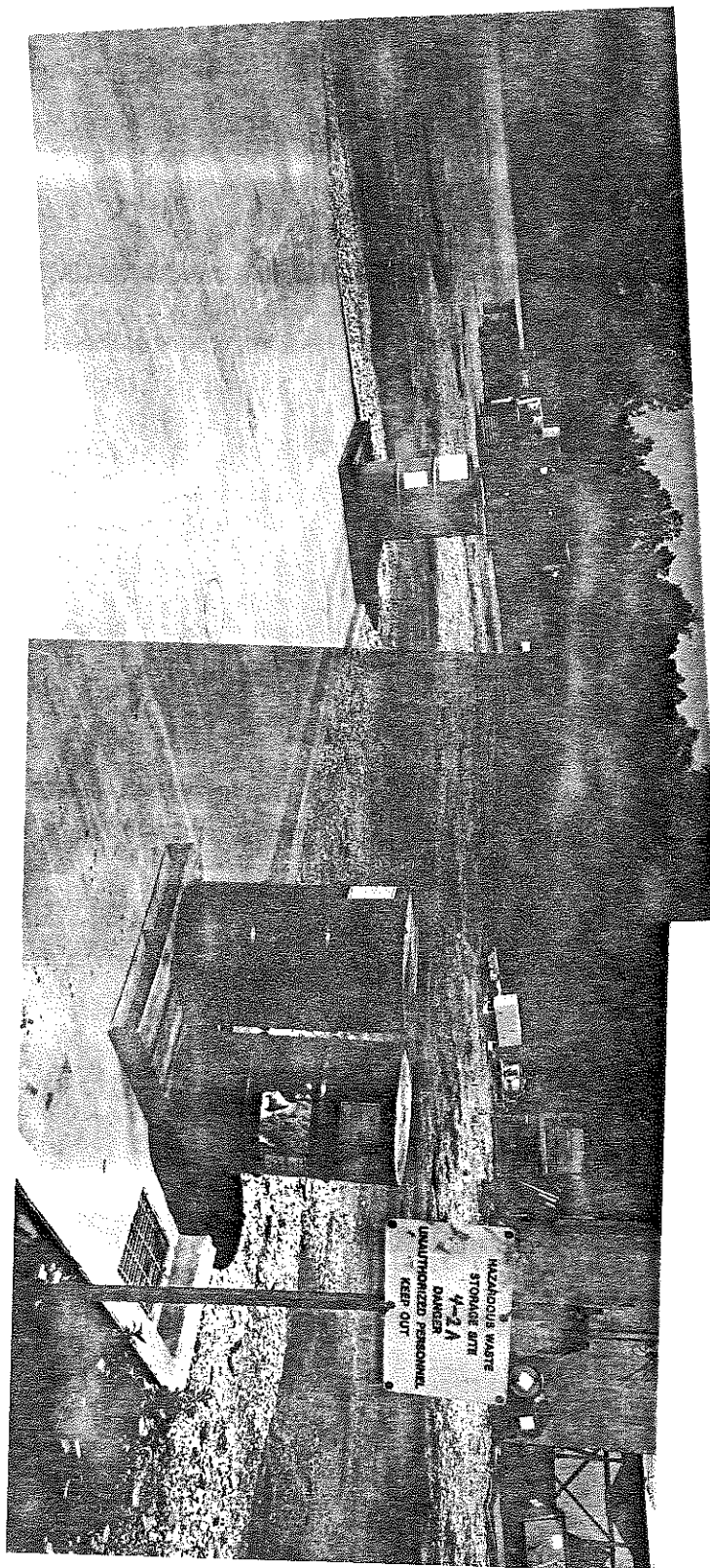
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Southwest

ROLL# 1560 PHOTO# 5

PHOTOGRAPH BY:

Will D. [Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 4-3

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1560 PHOTO# 6

PHOTOGRAPH BY:

Will D. [Signature]

DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 4-3

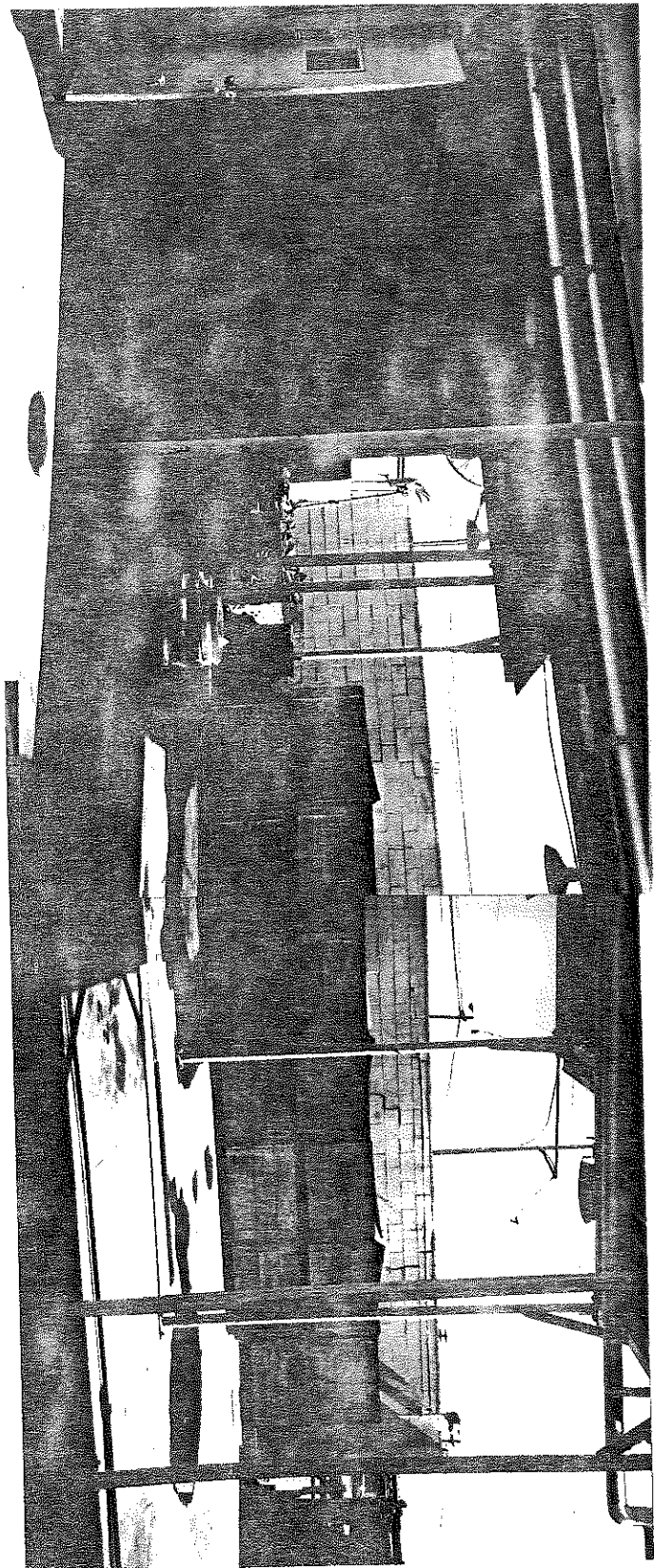
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ROLL# 1560 PHOTO# 7

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Will D. [Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 3-1

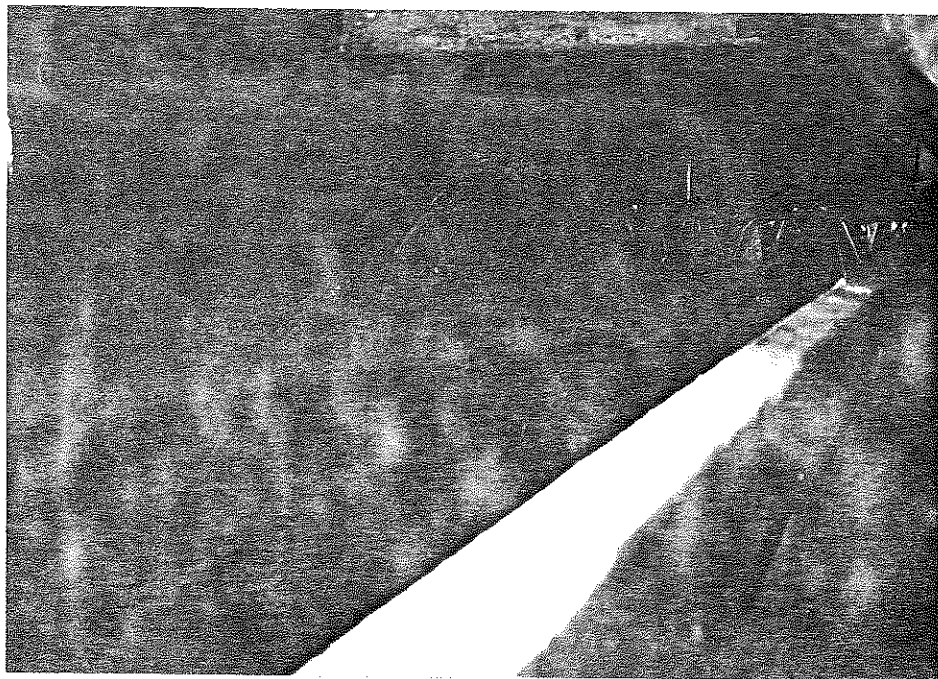
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ROLL# 1560 PHOTO# 8

PHOTOGRAPH BY:

Will D. [Signature]



DATE: _____

TIME: _____

I.D. _____

_____ County

PHOTOGRAPH TAKEN TOWARD THE:

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PHOTOGRAPH BY:

DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 3-1

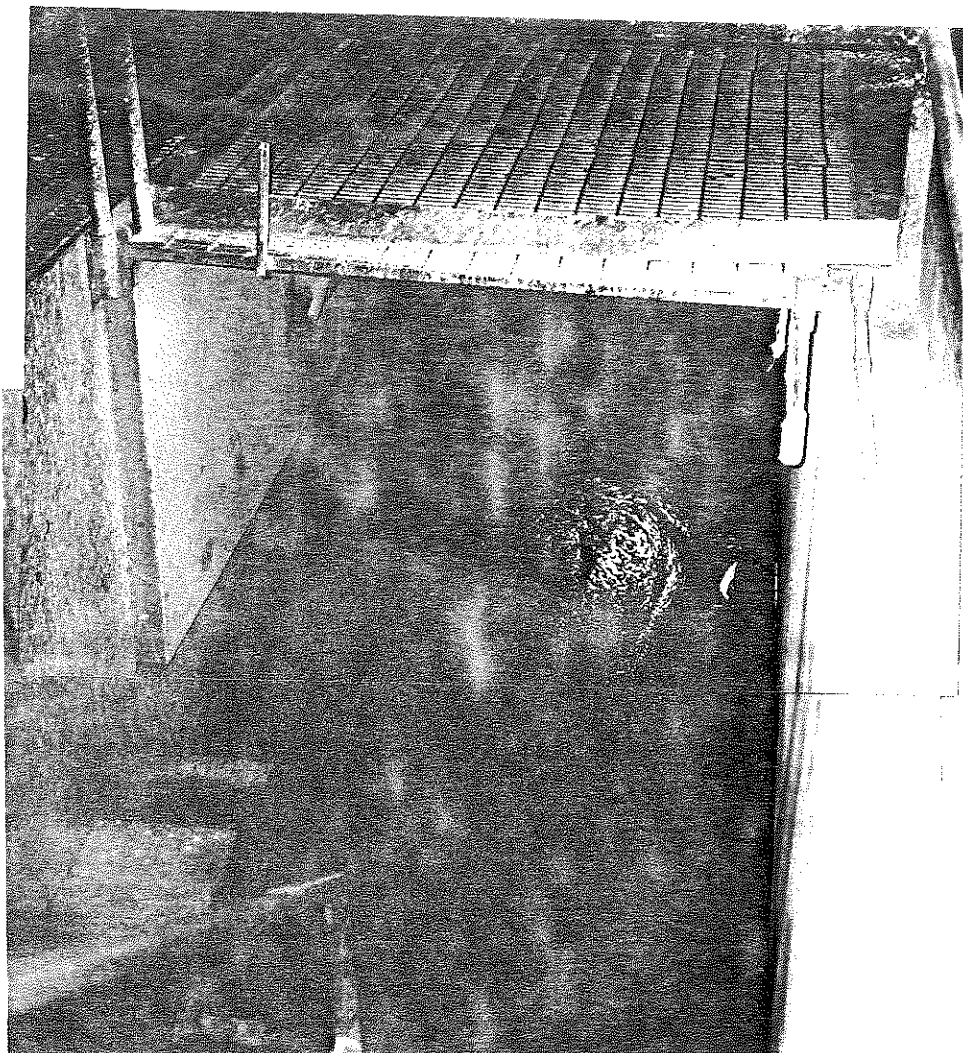
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[Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 3-1

PHOTOGRAPH TAKEN TOWARD THE:

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DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 3-1

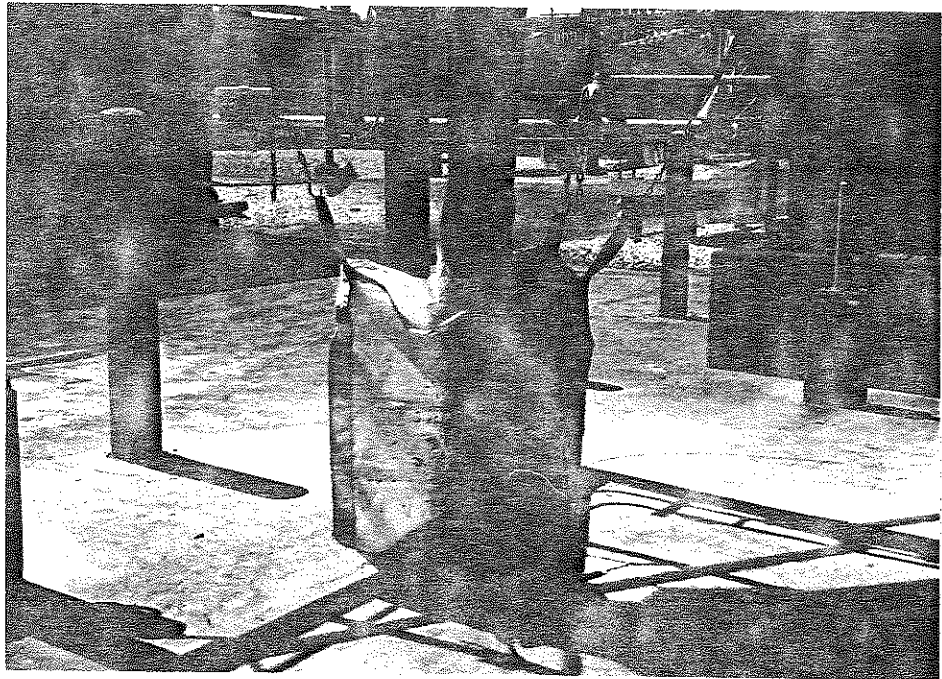
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DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp/Site 3-1

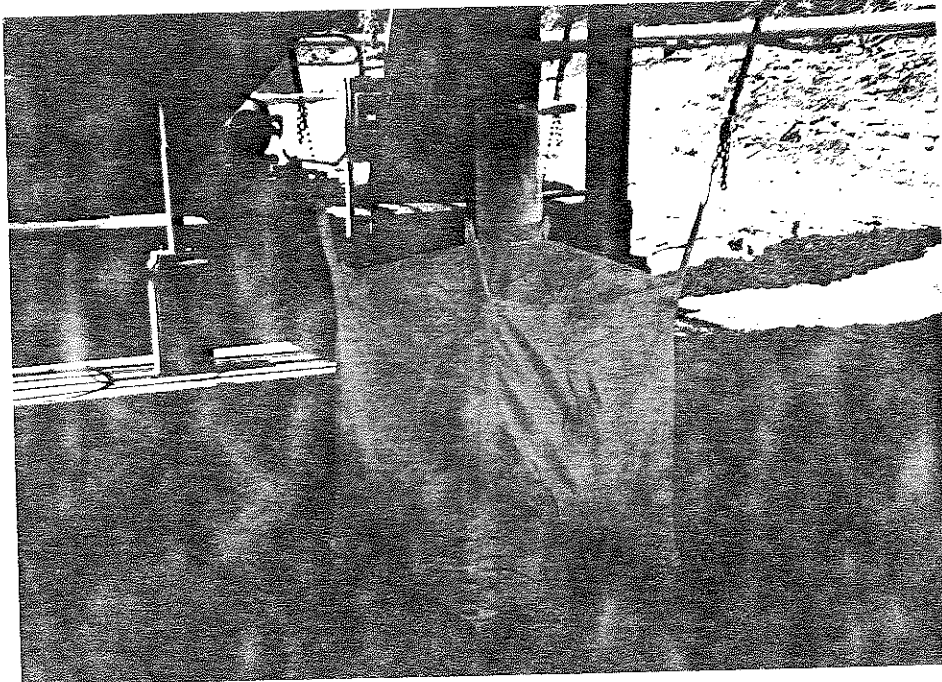
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DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 3-1

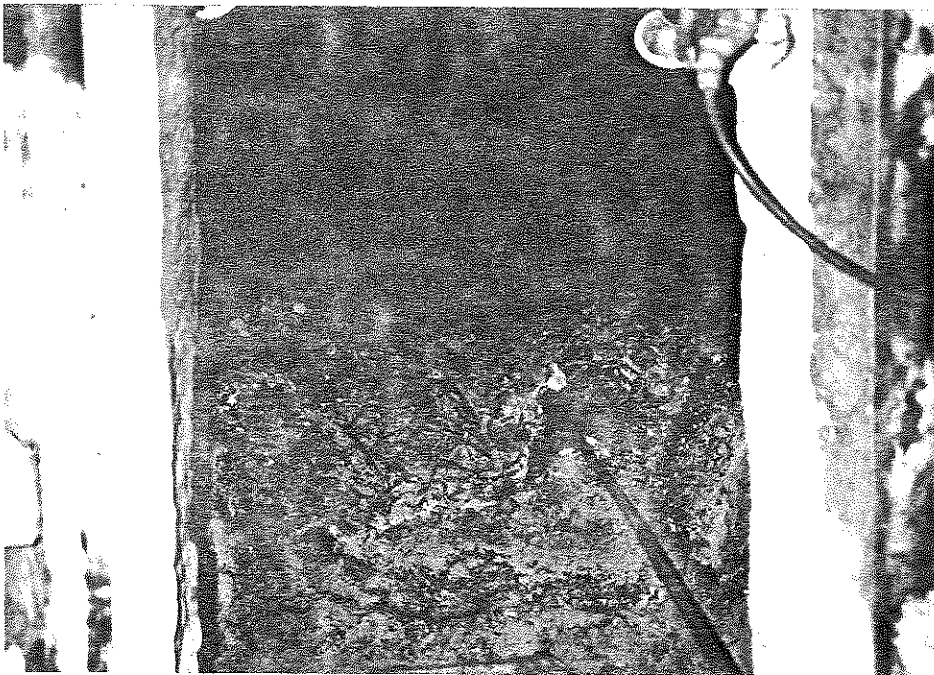
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Will D. [Signature]



DATE: _____

TIME: _____

I.D. _____

_____ County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# _____ PHOTO# _____

PHOTOGRAPH BY:

DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 3-1

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL# 1561 PHOTO# 2

PHOTOGRAPH BY:

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DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 3-1

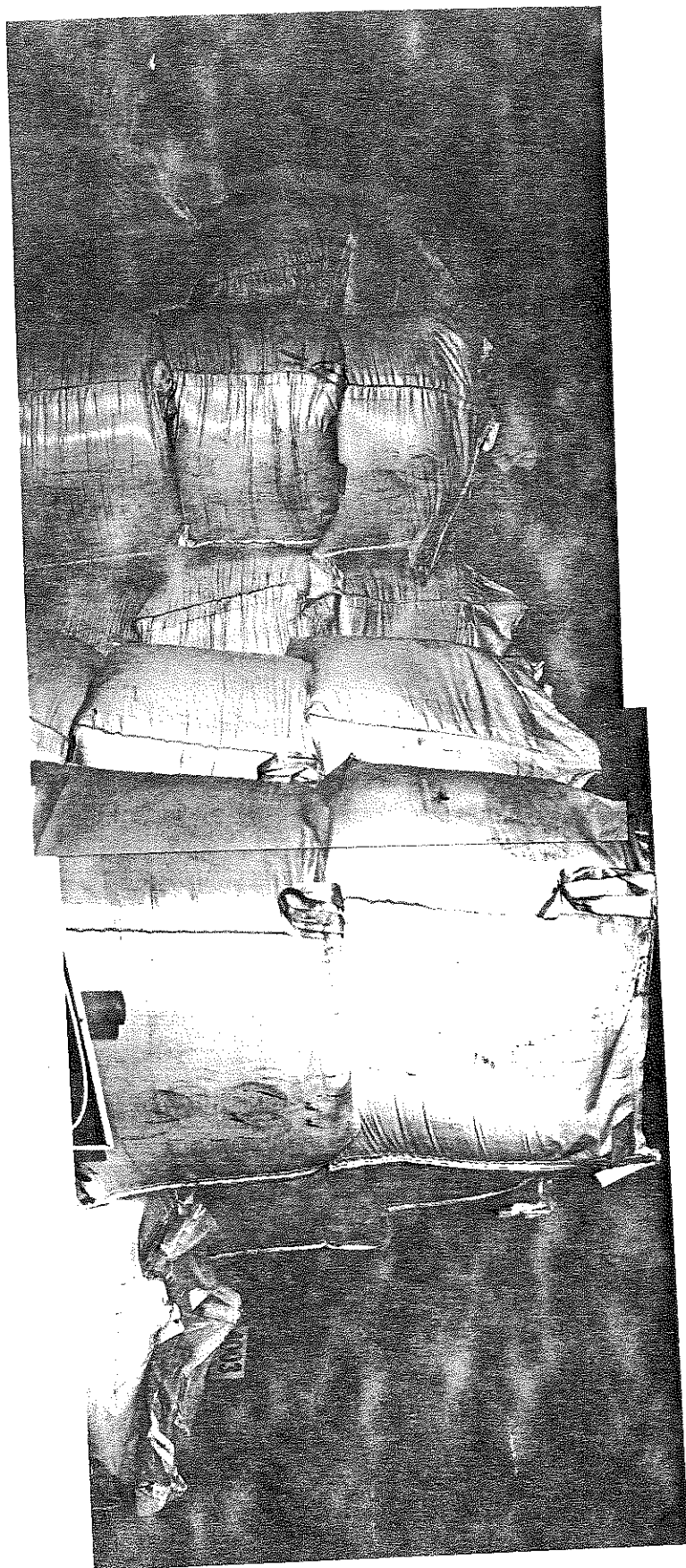
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Southeast

ROLL# 1561 PHOTO# 3

PHOTOGRAPH BY:

Will D



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-1

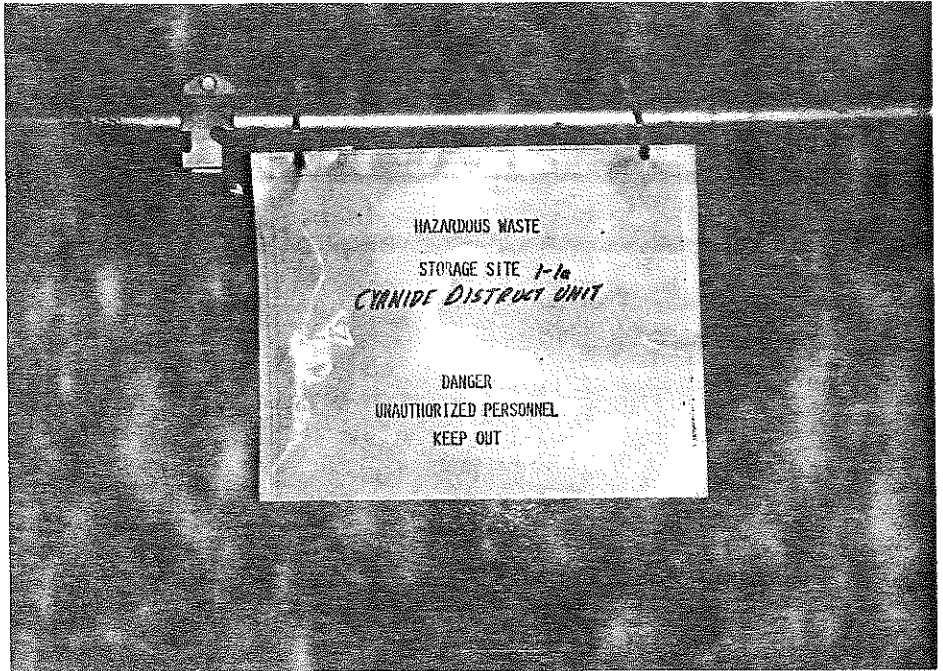
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South

ROLL# 1561 PHOTO# 4

PHOTOGRAPH BY:

William J. [Signature]



DATE: _____

TIME: _____

I.D. _____

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-1

PHOTOGRAPH TAKEN TOWARD THE:

Southeast

ROLL# 1561 PHOTO# 5

PHOTOGRAPH BY:

Will D. [Signature]

DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-1

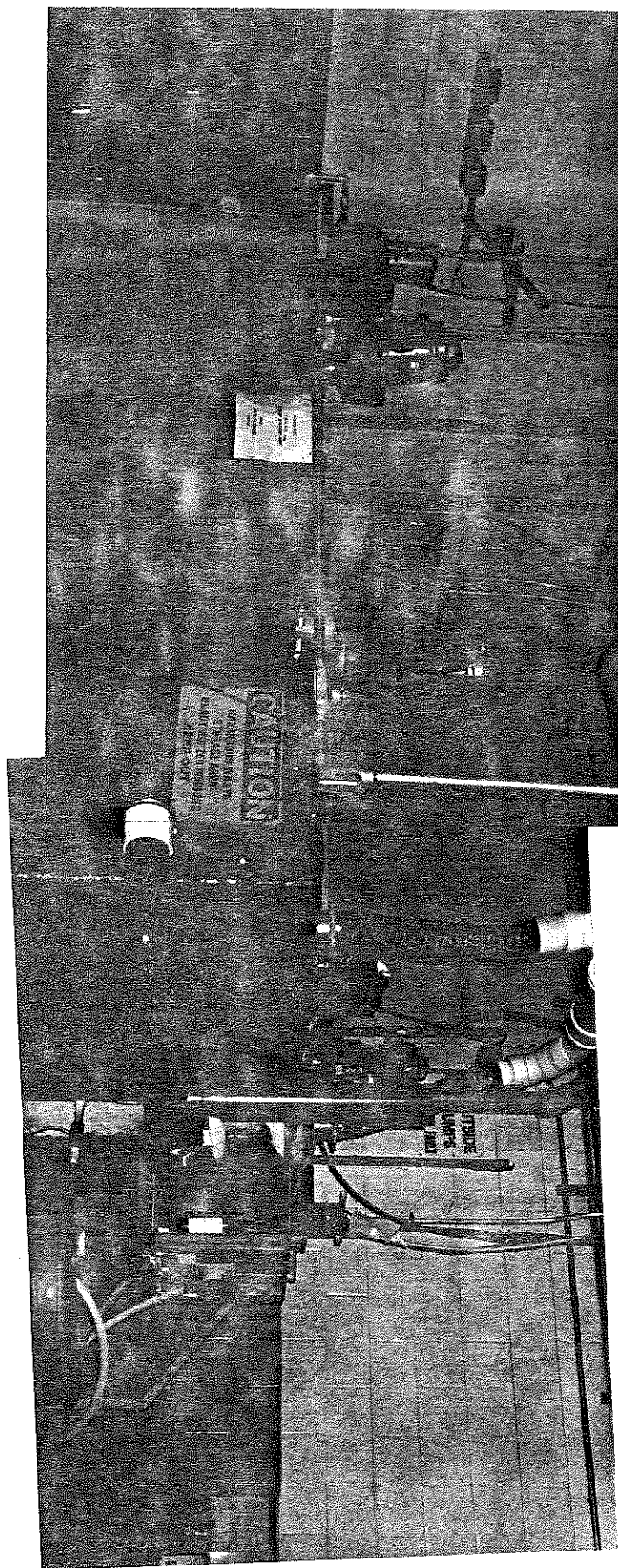
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Will D. [Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-1

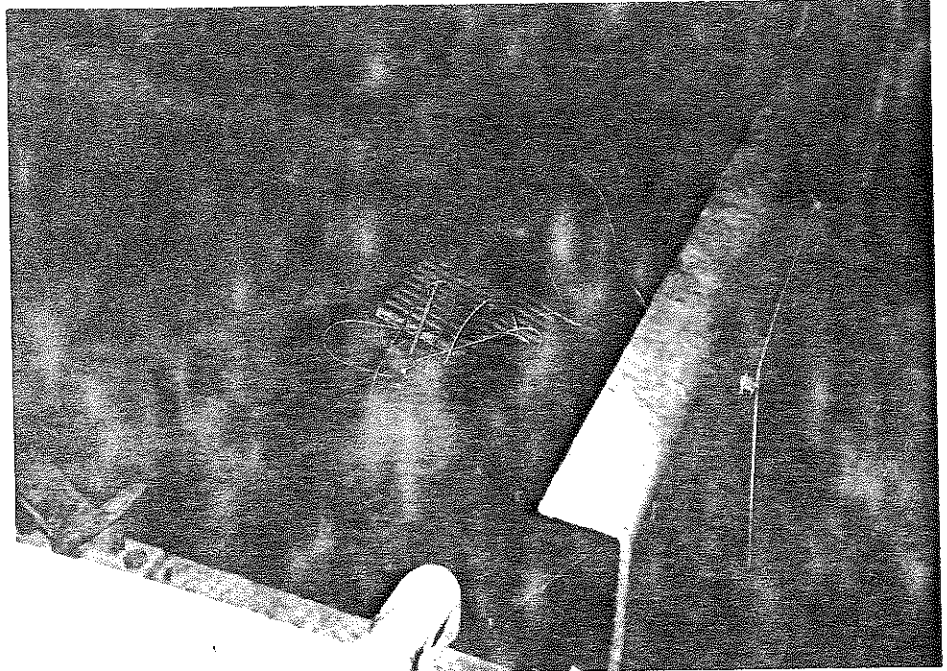
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Southeast

ROLL# 1561 PHOTO# 7

PHOTOGRAPH BY:

Will R. [Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-1

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1561 PHOTO# 8

PHOTOGRAPH BY:

Will R. [Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-11

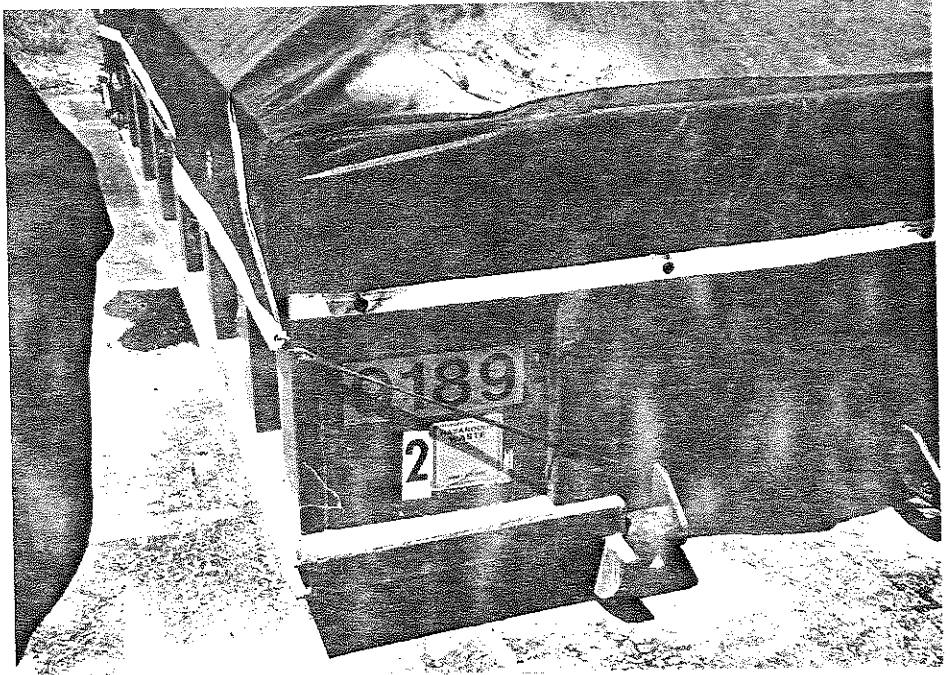
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West

ROLL# 1561 PHOTO# 9

PHOTOGRAPH BY:

[Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-11

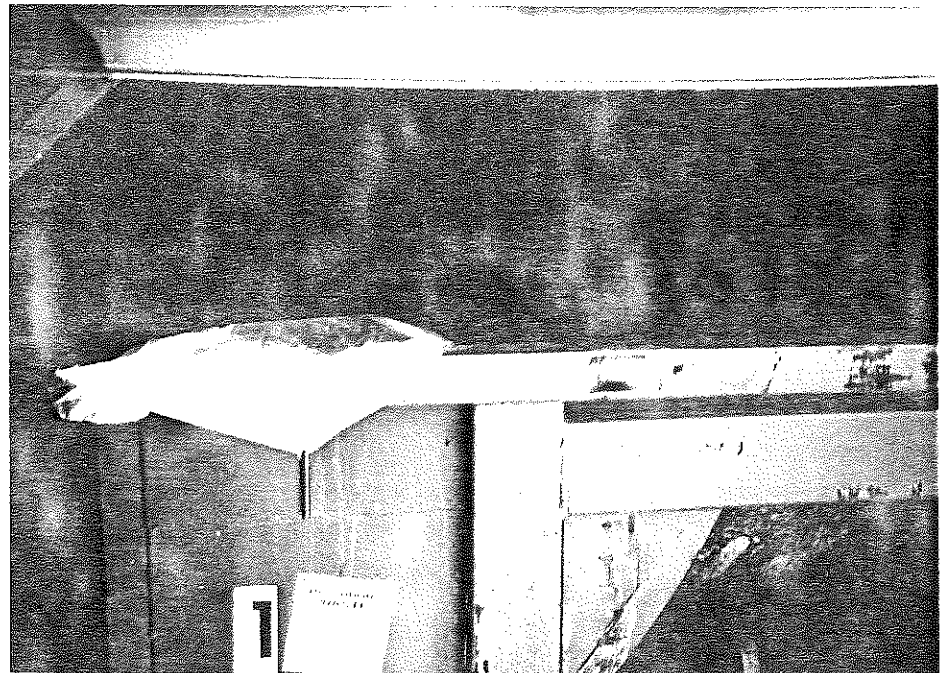
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ROLL# 1561 PHOTO# 10

PHOTOGRAPH BY:

[Signature]



DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-11

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1561 PHOTO# 11

PHOTOGRAPH BY:

Will D. St

DATE: May 1, 1991

TIME: 9:00-12:30

I.D. 1190200002

Madison County

Olin Corp./Site 1-11

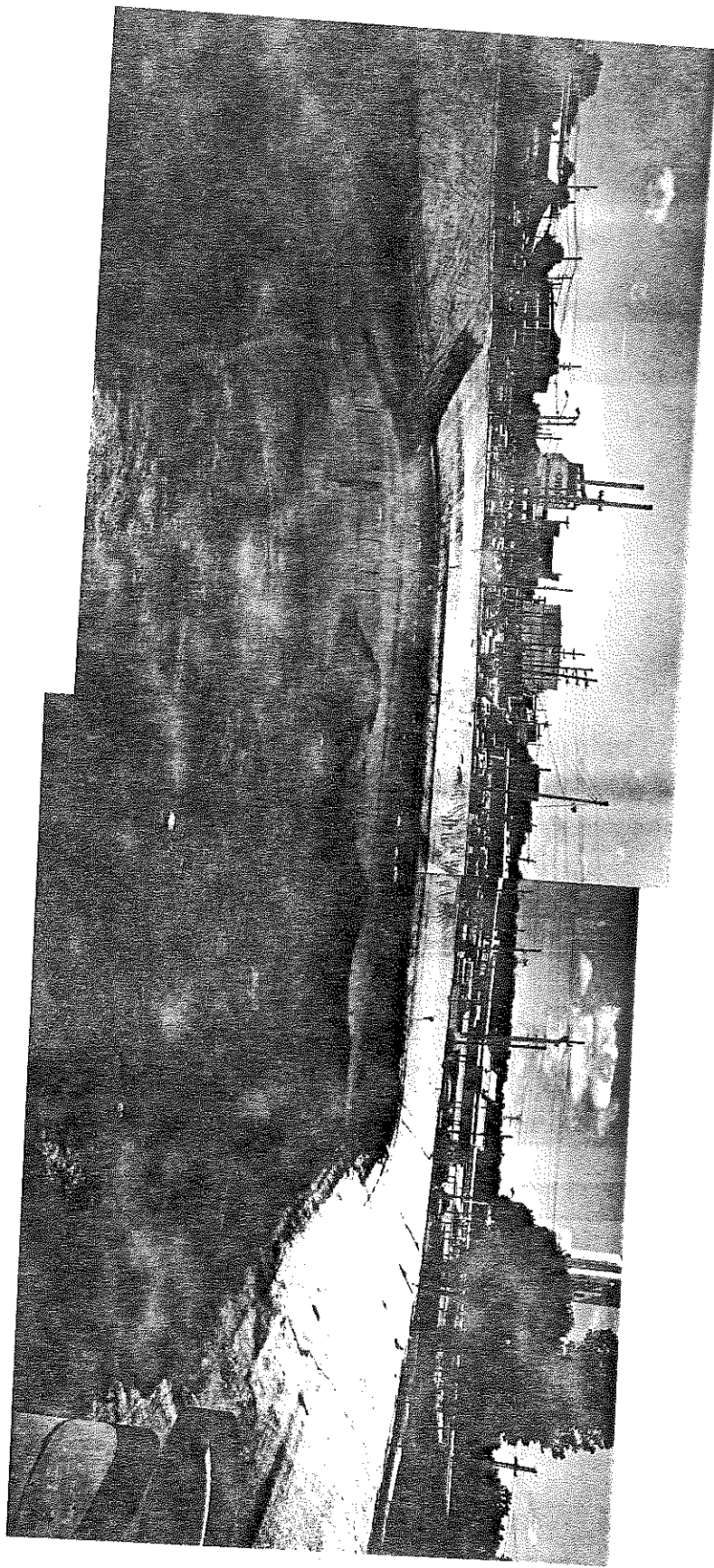
PHOTOGRAPH TAKEN TOWARD THE:

West Northwest

ROLL# 1561 PHOTO# 12

PHOTOGRAPH BY:

Will D. St



Area	Class	90 Day F-U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1				PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it gener- ates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1				Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facili- ties that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

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16 MAY 1991
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1190200002 - Madison County
 Oil & Gas Corporation - Main Plant
 ILD006271696
 May 1 & 3, 1991 Inspection

GEN-A-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
MAN	2				PART 722 GENERATOR STANDARDS Subpart B: The Manifest	<input checked="" type="checkbox"/>			
					Section 722.120: General Requirements				
					a Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
					b Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
					d In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

GEN-B-1

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
MAN	2				Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
MAN	2				Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
MAN	2				Section 722.123: Use of the Manifest For each manifest received, has the generator: 1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				
OTH	1	X		Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			X	<i>No waste ready for shipment off-site.</i>
OTH	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			X	
OTH	1	X		Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____ b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____			X	

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.	<input checked="" type="checkbox"/>			
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.		<input checked="" type="checkbox"/>		

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1	X			<p>Section 722.134: Accumulation Time</p> <p>NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p> <p>a1 For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>a3 For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a4 Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> <i>N/A</i> <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			<p><i>Also See 725</i></p> <p><i>no waste in Tanks</i></p> <p><i>A Few Drums did not contain accumulation dates</i></p> <p><i>See 725</i></p>

GEN-C-2(a)

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Complying with the requirements of: <ol style="list-style-type: none"> 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

GEN-C-26

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			c2	<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes _____ No _____ <i>N/A X</i></p> <p>Are the containers with the excess amounts marked with the date accumulation began? Yes _____ No _____</p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes _____ No _____</p>				

GEN-C-27

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	2				<p>PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting</p> <p>Section 722.140: Recordkeeping</p> <p>Has the generator retained for a period of three years:</p> <p>a - A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b - A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b - A copy of each exception report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c - Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			

GEN-D-1

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	2				Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 III. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	<input checked="" type="checkbox"/>			
MAN	1				Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and	<input checked="" type="checkbox"/>			

GEN-D-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes <u> X </u> No <u> </u> N/A <u> </u></p> <p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>			<u> X </u>	

GEN-D-3

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1/2				<p>PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste</p> <p>Section 722.152: General Requirements</p> <p>Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No <input checked="" type="checkbox"/></p> <p>NOTE: If "No", skip Subpart E. If "Yes", answer the next question.</p> <p>Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____</p> <p>NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.</p>			<input checked="" type="checkbox"/>	

GEN-E-1

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
MAN	1				PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste			X	
					b1 Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and				
					b2 Has the importer or his agent signed the manifest in place of the generator; and				
					b2 Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
					c Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

GEN-F-1

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	2	X			<p>PART 722 GENERATOR STANDARDS Subpart G: Farmers</p> <p>Section 722.170: Farmers</p> <p>Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes:</p> <ul style="list-style-type: none"> - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ <p>NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>				

GEN-G-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General Section 723.110: Scope Has the firm ever transported hazardous waste into the United States from abroad? Yes ____ No <input checked="" type="checkbox"/> Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes ____ No <input checked="" type="checkbox"/> NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				
OTH	1				Section 723.111: USEPA Identification Number Has the transporter obtained a USEPA identification number?				
OTH	1	X		a	Section 723.112: Transfer Facility Requirements Has a transporter of hazardous waste stored manifested shipments of such waste: <ul style="list-style-type: none"> - For a period of 10 days or less? Yes ____ No <input checked="" type="checkbox"/> 				<i>Facility is a TSD also.</i>

TR-A-1

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
					<p>- Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><u>NOTE:</u> A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.</p>				

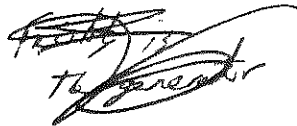
TR-A-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1/2			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping				
				Section 723.120: The Manifest System				
			a	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				Facility is the generator, transporter and TSD of the waste. Waste is loaded to areas utilizing manifest system
			b	Prior to transporting hazardous waste, has the transporter apparently: <ul style="list-style-type: none"> - Signed and dated the accompanying manifests? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - Returned a signed copy to the generator before leaving the generator's property? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				
			c	Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
d	Has the transporter who delivers hazardous waste to another transporter or to the designated facility:							

TR-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes <u>X</u> No <u> </u></p> <p>2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes <u>X</u> No <u> </u></p> <p>3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes <u>X</u> No <u> </u></p> <p>e Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes <u> </u> No <u> </u> N/A <u>X</u></p> <p>f Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes <u> </u> No <u> </u> N/A <u>X</u></p> <p>g Has the transporter who transports hazardous waste out of the United States:</p> <p>1) Indicated on the manifest the date the hazardous waste left the United States? Yes <u> </u> No <u> </u> <u>N/A</u></p> <p>2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes <u> </u> No <u> </u> <u>N/A</u></p>				

TR-B-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
MAN	1				3) Apparently returned a signed copy of the manifest to the generator? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes <input type="checkbox"/> No <input type="checkbox"/>				
					Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	X			
					NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes <input type="checkbox"/> No <input type="checkbox"/>				
					AND If "Yes", is the transporter recording on a log or shipping paper: 1) Name, address and USEPA ID number of the generator of the waste; AND 2) Quantity of waste accepted; AND				

TR-B-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) All shipping information required by U.S.D.O.T;</p> <p>AND</p> <p>4) The date the waste is accepted? Yes _____ No _____</p> <p>AND</p> <p>Does the transporter carry this record when transporting waste to the reclamation facility? Yes _____ No _____</p> <p>AND</p> <p>Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes _____ No _____</p> <p>Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:</p> <p>1) The designated facility on the manifest? Yes <input checked="" type="checkbox"/> No _____</p> <p>OR</p> <p>2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>OR</p>				

TR-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			3) The next designated transporter? Yes ____ No ____ N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
				OR				
				4) The place outside the United States designated by the generator? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				NOTE: A "No" answer can still be in compliance.				
			b	In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest, did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				Section 723.122: Recordkeeping				
			a	Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? Yes <input checked="" type="checkbox"/> No ____				Copies of manifest retained on-site.
		b	Has the transporter followed the procedures prescribed in Section 723.122(b) for recordkeeping for bulk shipments of hazardous waste by water? Yes ____ No ____ N/A <input checked="" type="checkbox"/>					
		c	Has the transporter followed the procedures prescribed in Section 723.122(c) for shipments of hazardous waste by rail within the United States? Yes ____ No ____ N/A <input checked="" type="checkbox"/>					

TR-B-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			d	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			e	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				OR				
			e	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				

TR-B-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1			PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges Section 723.130: Immediate Action			X	
			a	Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes ____ No ____				
			c	Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes ____ No ____				
OTH	1	X		Section 723.131: Discharge Clean-Up After a discharge of hazardous waste did the transporter: <ul style="list-style-type: none"> - Clean-up the discharge? Yes ____ No ____ - Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes ____ No ____ 			X	

TR-C-1

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1				PART 703 RCRA PERMIT PROGRAM Subpart B: Prohibitions				
					Section 703.121: RCRA Permits				
					a Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:				
					1) With a RCRA permit for the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					2) In conformance with all conditions imposed by the RCRA permit? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					b Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					b Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

Site 4-2a has
Part B permit, others
which not closed at the
time of this inspection
subject to TDS standards.

PER-B-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications				
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>Section 703.151: Application by New HWM Facilities</p> <p>For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes ____ No ____</p> <p>Is the facility only operating with a RCRA permit? Yes ____ No ____</p> <p>NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.</p>			X	
OTH	1			<p>Section 703.152: Amended Part A Application</p> <p>Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:</p> <p>1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes X No ____ N/A ____</p> <p>2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes X No ____ N/A ____</p> <p>NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.</p>	X			

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1				Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: <ul style="list-style-type: none"> a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	1				Section 703.155: Changes During Interim Status <p>NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.</p> <p>d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions	X			
					Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <u>NOTE: If "Yes", explain in narrative.</u> d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes <input type="checkbox"/> No <input type="checkbox"/> <i>N/A</i> <input checked="" type="checkbox"/>				

TSD-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
OTH	1			Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	<input checked="" type="checkbox"/>			
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <input checked="" type="checkbox"/> No ____	<input checked="" type="checkbox"/>			<i>Contained in Part B</i>

TSD-B-1

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				Contained in Part B
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <i>N/A</i></p>				<p><i>One per Year</i></p> <p><i>no off-site waste Accepted.</i></p>

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1	X			<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - <u>725.414</u> (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b	<p>Does a non-exempt facility have either:</p> <p>1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>OR</p> <p>2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><u>NOTE:</u> Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements	<input checked="" type="checkbox"/>			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health?				
				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment?				
				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards?				
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>							
b2	Is the written schedule at the facility?							
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>							
b3	Does the schedule identify the types of problems which are to be looked for during the inspection?							
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>							
b4	Does the schedule specify at least the following minimum inspection frequency:							
	- Daily inspections of areas subject to spills?							
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>							

TSD-B-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - <u>725.274</u> (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - <u>725.447</u> (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-7

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				<ul style="list-style-type: none"> - A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
					<p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-9

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			<p>2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			e		<p>Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				
					Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes				
			a		<p>Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a		<p>Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
					Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes _____ No _____ N/A <u>X</u>			X	
					NOTE: A "Yes" answer is a violation of the location standard.				

TSD-B-12

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X			Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

TSD-C-1

Area	Class	90 Day F:U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
			d	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NOTE: Any "N/A" answer must be explained in the Comments.				

TSD-C-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1	X			Section 725.134: Access to Communications or Alarm Systems	X			
			a		Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			b		If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
OTH	1	X			Section 725.135: Required Aisle Space	X			
					Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
OTH	2				Section 725.137: Arrangements with Local Authorities	X			
			a		Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				Letters Sent June 7, 1990 and sent revised Contingency Plan

TSD-C-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p><i>Okn has Full-time Fire Dept but also has Mutual Assistance Agreement from Area Dept.</i></p>

TSD-C-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Con- tingency Plan	<input checked="" type="checkbox"/>			
				a Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazard- ous waste constituents to air, soil, or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Have the provisions of the plan been carried out immedi- ately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
OTH	2			Section 725.152: Content of Contingency Plan a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-1

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				<p>Each Site Supervisor is TL EC for that Site.</p>

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.		
			Ltr		Yes	No				
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>					
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>						
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			Section 725.153: Copies of Contingency Plan							
			a	Has a copy (and all revisions) of the contingency plan:						
			a)	Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			b	Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						

TSD-D-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: a 1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b 2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d 4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> e 5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	2				Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

TSD-D-4

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1/2				<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>			
									<p><i>Releases have been reported, responded to and then written reports submitted as required.</i></p>

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes ____ No <u>X</u> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility:			X	<i>Olin uses this Manifest for shipments within their site. However must travel along some public roads so waste is manifested.</i>
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ____ No ____				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ____ No ____ N/A ____				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes ____ No ____				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ____ No ____				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ____ No ____				

TSD-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	in Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes _____ No _____ N/A _____</p> <p>Does the facility initiate shipments of hazardous waste? Yes _____ No _____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>			X	
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes _____ No _____</p>				
			d	<p>If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes _____ No _____</p>				

TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				Section 725.173: Operating Record	<input checked="" type="checkbox"/>			
					<p>a Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the operating record contain the following information:</p> <ol style="list-style-type: none"> 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 				

TSD-E-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> - 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.325 (Surface Improvements)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.352 (Waste Piles)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.373 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.441 (Incinerators)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.475 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.502 (Chem., Phys., Bio. Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				<p><i>Later Evid Segment</i></p>

TSD-E-4

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
					<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				

TSD-E-5

Area	Class	90 Day F.U. Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
					12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					Section 725.174: Availability, Retention and Disposition of Records				
					a During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					c Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to:				
					- The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/>				
					- The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					b Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-E-6

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	X			
OTH	1				Section 725.176: Unmanifested Waste Report Does the facility accept hazardous waste from off-site? Yes _____ No _____ NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177. Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes _____ No _____ Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes _____ No _____ NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions: Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes _____ No _____				Waste accepted is from Siterona. Olin is the generator, transporter, and TSD

TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____</p> <p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>	X			
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes <u>X</u> No ____ N/A ____</p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A <u>not expected</u></p>				
			c	<p>3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A <u>X</u></p>				

TSD-E-8

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
CLO	1				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements	<input checked="" type="checkbox"/>			
					Section 725.212: Closure Plan a Was the most current facility closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				

Surface impoundment going through extended closure.

TSD-G/H-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
CLO	1				<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A <input checked="" type="checkbox"/> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A <input checked="" type="checkbox"/> 				
					Section 725.218: Post-Closure Plan				
					a	<p>Was the most current facility post-closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No ____</p> <p>Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>			
FIN	1				Section 725.242: Cost Estimate for Closure				
					Has the facility prepared a written estimate of the cost of closing the facility?				
FIN	1				Section 725.244: Cost Estimate for Post-Closure Care				
					Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?				
<p><u>NOTE:</u> If no post-closure plan, mark "N/A".</p>									

TSD-G/H-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	X			<i>Many Containers Storage Areas subject to Approved Closure Plan and are being closed and are operating as a 90 day or less generator. Site 4-2a) is Part B permitted. Until Closure Certification approved this Section Subject will apply however 90 day delay & labeling requirements also checked.</i>
OTH	1	X			Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	X			
OTH	1	X			Section 725.273: Management of Containers a Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	X			
OTH	2				b Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	X			
OTH	2				Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
					NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				
OTH	1	X			Section 725.276: Special Requirements for Ignitable or Reactive Wastes	<input checked="" type="checkbox"/>			
					Are containers holding ignitable or reactive waste located at least 50 feet from the property line?				
OTH	1	X			Section 725.277: Special Requirements for Incompatible Wastes		<input checked="" type="checkbox"/>		
					Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?				

TSD-I-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems</p> <p>Section 725.290: Applicability</p> <p>Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If "No", skip Subpart J.</p> <p>NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.</p> <p>Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>NOTE: Failing the filter test means that the waste contains free liquids.</p>				
			a	<p>Section 725.291: Assessment of Existing Tank Systems</p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p>			X	TANK has secondary containment provided.

TSD-J-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1		b		<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____ <p>Section 725.292: Design and Installation of New Tank Systems or Components</p>			X	
			a		<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ____ No ____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes ____ No ____ 				

TSD-J-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ____ No ____				
				Section 725.293: Containment and Detection of Releases				
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ____ No ____ N/A ____ <u>or</u> If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

Located over containment which drains to sump which is part of Facility's NPDES WWWT system.

TSD-J-4

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
					i Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-J-5

Area	Class	90 Day F.U. Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			Section 725.294: General Operating Requirements b1&2 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <u>X</u> No <u> </u> b3 Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <u> </u> No <u> </u> N/A <u>X</u> c If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes <u> </u> No <u> </u> N/A <u>X</u>	X			
OTH	2				Section 725.295: Inspections c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes <u>X</u> No <u> </u>	X			
OTH	1	X			Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <u> </u> No <u>X</u> NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).			X	

TSD-J-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ____ No ____ N/A ____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ____ No ____ N/A ____</p> <p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>			X	
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ____ No ____</p>				
			a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ____ No ____</p>				
			b	<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ____ No ____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

TSD-J-8

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	1				Section 725.298: Special Requirements for Ignitable or Reactive Wastes Are ignitable or reactive wastes stored in tanks? Yes ____ No ____ NOTE: If "No", skip to Section 725.299. a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ____ No ____ NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes. b Are there proper protective distances between the waste management area and the facility boundary line? Yes ____ No ____			X	
					Section 725.299: Special Requirements for Incompatible Wastes Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ____ No ____ N/A ____			X	

TSD-J-9

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				<p>Section 725.300: Waste Analysis and Trial Tests</p> <p>In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:</p> <p>a 1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____</p> <p style="text-align: center;">or</p> <p>b 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____</p> <p>NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.</p>	X			<p><i>Stores one specific waste stream</i></p>

TSD-J-10

Area	Class	90 Day F-U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart K: Surface Impoundments Section 725.321: Design Requirements a Has the owner or operator met the requirements for liners and leachate collection systems in accordance with 35 Ill. Adm. Code 724.321(c) for each new unit, or lateral expansion of an existing unit, that is within the area identified in the facility Part A permit application? Yes ____ No ____ N/A ____ NOTE: If "N/A" is checked, provide a detailed explanation of why the site is not subject to the requirements, or why the requirements have been waived by the Agency pursuant to 725.321(c) or (d) and skip to 725.322. a Did the owner or operator meet the above requirement for waste received after May 8, 1985? Yes ____ No ____ b Has the owner or operator notified the Agency, in writing, at least 60 days prior to receiving waste? Yes ____ No ____ b Did the owner or operator submit a Part B permit application within six months of the Agency's receipt of notification? Yes ____ No ____			X	<i>Extended/Delayed closure being pursued for this unit to allow continue use for non-hazardous waste waters while groundwater monitoring occurs.</i> <i>Since Surface Impoundment is not being used for hazardous wastes this Section not completed.</i> NOTE: <i>The Facility does document daily injections for this unit to ensure sufficient freeboard is maintained.</i>
OTH	1	X			Section 725.322: General Operating Requirements b Does the owner or operator make the claim that a free board of less than two feet may be maintained in the surface impoundment? Yes ____ No ____				

TSD-K-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart L: Waste Piles Section 725.351: Protection from Wind Is the waste pile subject to dispersal by the wind? Yes ____ No ____ NOTE: If the answer is "Yes", complete the rest of this section. If "No", then check "N/A" and describe why the pile is not subject to wind dispersal in the Remarks. Is the owner or operator: 1) Covering the pile to control dispersal? Yes ____ No ____ N/A ____ OR 2) Managing the pile by some other means to control dispersal? Yes ____ No ____ N/A ____ NOTE: If the answer to 2 is "Yes", explain in detail the "other means" being used to control dispersal.			X	No piles on the site. The site is pursuing closure of piles which were at the site in 1981-1982. Since no waste in piles at the facility this section is completed.
OTH	1			a1	Section 725.352: Waste Analysis Are the only wastes the facility receives which are amenable to piling compatible with each other? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	1				<p>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart 0: Incinerators</p> <p>Section 725.440: Applicability</p> <p>b If the owner or operator claims to be exempt from the requirements of this subpart, except for Section 725.451 (closure), has he documented in writing (and has he retained at the facility this documentation) that the waste to be burned is identified in 725.440(b) and that it would not reasonably be expected to contain any of the hazardous constituents listed in 35 Ill. Adm. Code 721, Appendix H? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><u>NOTE:</u> If the answer is "No", the facility is regulated under this Subpart.</p> <p>Section 725.441: Waste Analysis</p> <p>Has the owner or operator obtained analyses of wastes prior to the first time they are burned in the incinerator to enable him to establish steady state operating conditions and to determine the types of pollutants which might be emitted? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the waste analysis include at least:</p> <p>a 1) Heating value of the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
			b		2) Halogen and sulfur content of the waste? Yes ____ No ____ <i>N/A</i>				
			c		3) Lead and mercury content of the waste? Yes <i>X</i> No ____ <i>N/A</i>				
			c		4) Written documented data to show that the waste does not contain lead or mercury? Yes ____ No ____ <i>N/A</i>				
OTH	1	X			Section 725.445: General Operating Requirements	<i>X</i>			
					Are wastes fed to the incinerator only when it is at steady state (normal) conditions of operation, including temperature and air flow?				
OTH	1				Section 725.447: Monitoring and Inspections	<i>X</i>			
					Is the owner or operator conducting the following moni- toring and inspections when incinerating hazardous waste:				
			a		1) Existing instruments which relate to combustion and emission control every 15 minutes? Yes <i>X</i> No ____				
			b		2) The complete incinerator and associated equip- ment for leaks, spills, and fugitive emissions once a day? Yes <i>X</i> No ____				
			b		3) All emergency shutdown controls and systems alarms to assure proper operations at least once a day? Yes <i>X</i> No ____				

TSD-0-2

Area	Class	90 Day F.U. Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
CLO	1				<p>Section 725.451: Closure</p> <p>NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.</p> <p>Have all hazardous wastes and hazardous waste residues (including, but not limited to, ash, scrubber waters and scrubber sludges) been removed from the incinerator at the completion of closure?</p>			X	
OTH	1				<p>Section 725.452: Interim Status Incinerators Burning Particular Hazardous Wastes</p> <p>a Prior to burning hazardous waste numbers F020, F021, F022, F023, F026 or F027, has the owner or operator received a certification from the Agency that they meet the performance standards of 35 Ill. Adm. Code 724, Subpart 0, and have followed the procedures in 725.452(b)(1)?</p>			X	

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.	
			Sub	Sec		Yes	No			
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart Q: Chemical, Physical and Biological Treatment Section 725.500: Applicability Is the chemical, physical or biological treatment being done in other than: 1) Tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Surface impoundments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Land treatment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer to all of the above is "Yes", complete this Section. Chemical, physical and biological treatment of hazardous waste in tanks, surface impoundments and land treatment facilities is regulated under 35 Ill. Adm. Code 725 (724), Subparts J, K, and M, respectively. Section 725.501: General Operating Requirements					
					a	Is the chemical, physical or biological treatment of hazardous waste in compliance with Section 725.117(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
					b	Are only hazardous waste treatment reagents being placed in the treatment process or equipment which will not cause the treatment process or equipment to rupture, leak, corrode, or otherwise fail before the end of its intended life? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Hammermills used to treat primers.
OLA submitted Part A Withdrawal request as the claim material is non-hazardous however they are monitoring all 725 requirements until 1/88 request is approved by the Agency

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1		c		Where hazardous waste is continuously fed into a treatment process or equipment, is the process or equipment equipped with a means to stop this inflow? Yes ____ No ____ N/A <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	All waste is like in nature. Scrap primers
					Section 725.502: Waste Analysis and Trial Tests Prior to using the treatment process or equipment to chemically, physically or biologically treat a hazardous waste, which is substantially different from waste previously treated in a treatment process or equipment; or a substantially different process from any previously used at the facility is used to chemically treat hazardous waste, has the owner or operator: b1 1) Conducted waste analyses or trial tests? Yes ____ No ____ N/A ____ OR b2 2) Obtained written documented information on similar treatment of similar waste under similar operating conditions? Yes ____ No ____ N/A ____				
OTH	1/2				Section 725.503: Inspections a Is the owner or operator inspecting, where present: 1) Discharge control equipment and safety equipment at least once each operating day to ensure it is in good working order? Yes <input checked="" type="checkbox"/> No ____ N/A ____	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		b	2) Data gathered from monitoring equipment at least once each operating day to ensure that the treatment process or equipment is being operated according to its design? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	3) The construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	4) The construction materials of, and the area immediately surrounding, discharge confinement structures at least weekly to detect erosion or obvious signs of leakage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspection, the date of the last inspection, etc., to determine if inspections are actually being done. Section 725.504: Closure NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan. Have all hazardous wastes and hazardous waste residues been removed from treatment processes or equipment, discharge control equipment and discharge confinement structures at the completion of closure?					

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				Section 725.505: Special Requirements for Ignitable or Reactive Wastes a Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in the treatment process or equipment so that: 1) The resulting waste, mixture and dissolution of material no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> AND 2) Section 725.117(b) is complied with? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> OR b Is the waste treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			<i>Purpose of Hammermill is to pulverize very fines.</i>
OTH	1				Section 725.506: Special Requirements for Incompatible Wastes Is the owner or operator complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?			<input checked="" type="checkbox"/>	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>PART 728 LAND DISPOSAL RESTRICTIONS</p> <p>Section 722.111(d) - Waste Identification (Information Only)</p> <p>1. Does the facility handle the following wastes?</p> <p>a. F001 through F005 spent solvents Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> List* <u>F002, F003</u></p> <p>b. Dioxin-containing wastes Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> List* <u></u></p> <p>c. California List wastes Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> List* <u>See Third Third.</u></p> <p>d. First, Second and Third Third wastes <u>D001, D009, D008,</u> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> List* <u>K016, F001-09,</u></p> <p>*List waste if room allows or attach Appendix A.</p> <p>2. Does the facility handle the following wastes (National Capacity Variances)?</p> <p>a. F001-F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date - 11/8/90). Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/8/90).</p> <p>Yes ____ No <u>X</u></p> <p>c. California List contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/8/90).</p> <p>Yes ____ No <u>X</u></p> <p>d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052 or K071 (effective date - 8/8/90).</p> <p>Yes ____ No <u>X</u></p> <p>e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103 and K104 (effective date - 8/8/90).</p> <p>Yes ____ No <u>X</u></p> <p>f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 6/8/91)</p> <p>Yes ____ No <u>X</u></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.												
				YES	NO														
			<p>Section 728.107 - Waste Analysis Treatability Group - Treatment Standards Identification)</p> <p>F-solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?</p> <p>Yes <u>X</u> No <u> </u> N/A <u> </u></p> <p>If yes, check the appropriate treatability group.</p> <p><u> </u> Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight).</p> <p><u>X</u> All other spent solvent wastes.</p> <p>First, Second and Third Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?</p> <p>Yes <u>X</u> No <u> </u> N/A <u> </u></p> <p>If yes, list the waste code and check the correct treatability group.</p> <table border="1"> <thead> <tr> <th>Waste Code</th> <th>Wastewater*</th> <th>Non-Wastewater</th> </tr> </thead> <tbody> <tr> <td><u>P006--09</u></td> <td><u>X</u></td> <td><u>X</u></td> </tr> <tr> <td><u>K016</u></td> <td><u>X</u></td> <td><u>X</u></td> </tr> <tr> <td><u>D001, D002, D003</u></td> <td><u> </u></td> <td><u>X</u></td> </tr> </tbody> </table> <p>* less than 1% TOC by weight and less than 1% filterable solids.</p>	Waste Code	Wastewater*	Non-Wastewater	<u>P006--09</u>	<u>X</u>	<u>X</u>	<u>K016</u>	<u>X</u>	<u>X</u>	<u>D001, D002, D003</u>	<u> </u>	<u>X</u>				<p>was discharged to Tomet Plant. Tomet Plant Sludge shipped off-site (w/ing)</p>
Waste Code	Wastewater*	Non-Wastewater																	
<u>P006--09</u>	<u>X</u>	<u>X</u>																	
<u>K016</u>	<u>X</u>	<u>X</u>																	
<u>D001, D002, D003</u>	<u> </u>	<u>X</u>																	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Section 728.142: Treatment Standards Expressed as Specified Technologies</p> <p>1) For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers or incineration?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>If yes, specify the method: _____</p> <p>1) For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>2) For hazardous waste that contains HOCs in total concentrations greater than or equal to 1000 mg/l or 1000 mg/kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of Part 724, Subpart 0 or Part 725, Subpart)?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Are the following non-wastewater forms of the following hazardous wastes incinerated in accordance with the requirements of 35 Ill. Adm. Code 724, Subpart 0 or 35 Ill. Adm. Code, Subpart 0 or burned in boilers or industrial furnaces as defined in 35 Ill. Adm. Code 720 in accordance with 35 Ill. Adm. Code 726: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, U058, U087, U221, U223?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>4) Are the following wastewater forms of the following hazardous wastes treated by carbon adsorption, incineration or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, U058, U087, U221, U223?</p> <p>Yes _____ No _____ N/A <u>Y</u></p> <p>If an alternative method is used, specify the method and state whether the facility has received approval from the Agency for an exemption from the incineration requirement:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Section 728.141 - Treatment Standards Expressed as Concentrations in <u>Waste Extract</u></p> <p>Does the generator mix restricted wastes with different treatment standards?</p> <p>Yes <u>X</u> No _____</p> <p>If yes, did the generator select the most stringent treatment standards (728.141(b))?</p> <p>Yes <u>X</u> No _____</p> <p>Section 728.143 - Treatment Standards Expressed as Concentrations in <u>Waste</u></p> <p>Does the generator mix restricted wastes with different treatment standards?</p> <p>Yes <u>X</u> No _____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>If yes, did the generator select the most stringent treatment standards (728.143(b))?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Section 728.107 - Waste Analysis</p> <p>Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:</p> <p>1) Knowledge of Waste Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>List the waste for which "applied knowledge" was used and describe the basis of the applied knowledge determination.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Was all supporting data retained on-site?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Total Constituent Analysis? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>List the waste for which total constituent analysis was used and provide the date of the last test, the frequency of testing and note any problems.</p> <p>_____</p> <p>_____</p> <p>_____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>3) TCLP? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>List the wastes for which TCLP was used and provide the date of last test, the frequency of testing and note any problems.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Section 728.132 - Waste Specific Prohibitions - California List Wastes</p> <p>Are the following hazardous wastes being land disposed:</p> <p>1) Liquid (*) hazardous wastes having a pH less than or equal to 2.0?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>2) Liquid (*) hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Liquid (*) hazardous wastes that are primarily water and contain HOCs in total concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>NOTE: The following hazardous wastes are prohibited from land disposal unless they are disposed of in a landfill or surface impoundment which has been granted a case-by-case extension pursuant to Section 728.105:</p> <p>1) Liquid hazardous wastes that contain HOC's in total concentration greater than or equal to 1000 mg/l and are not prohibited under Subsection a) 3); and</p> <p>2) Non-liquid hazardous wastes containing HOC's in total concentrations greater than or equal to 1000 mg/kg and which are not wastes described in Subsection 728.132(d).</p> <p>NOTE: The requirements of Subsections (a), (d) and (e) do not apply if:</p> <p>1) an adjusted standard has been granted by the Agency pursuant to a No-Migration Petition under Section 728.106; or</p> <p>2) a case-by-case extension has been granted by the Agency pursuant to Section 728.105; or</p> <p>3) the waste meets applicable treatment standards or where treatment standards are not specified, the waste is subject to a statutory prohibition.</p> <p>* Did the operator use the Paint Filter Liquids Test Method 9095 (pursuant to Section 720.111) to determine if the waste is a liquid?</p> <p>(NOTE: Wastes subject to a Nationwide Capacity Variance are not subject to this Section).</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.															
				YES	NO																	
			<p>Is restricted waste treated or stored greater than the time limits specified in Section 722.134?</p> <p>Yes _____ No _____</p> <p>If yes, the TSD checklist must be completed.</p> <p>Section 728.107 - Waste Analysis</p> <p>1) A. Does the generator ship any waste that exceeds the treatment standards to an off-site disposal <i>treatment</i> facility?</p> <p>Yes <u>X</u> No _____ (If no, go to B)</p> <p>Does the generator ship any waste that exceeds the treatment standards to an off-site disposal facility? (NOTE: If yes, this is a violation of the LDR restrictions.)</p> <p>Yes _____ No _____</p> <p>If yes, identify the waste code and off-site treatment, storage or disposal facilities:</p> <table border="0"> <thead> <tr> <th><u>Waste Code</u></th> <th><u>Facilities</u></th> <th><u>Treat/Store/Dispose</u></th> </tr> </thead> <tbody> <tr> <td><u>F002, D001, F005</u></td> <td><u>S-K</u></td> <td><u>Treat</u></td> </tr> <tr> <td><u>K001, F009, D001</u></td> <td><u>PDC/Heritage</u></td> <td><u>Treat/Dispose</u></td> </tr> <tr> <td><u>D008</u></td> <td><u>PDC</u></td> <td><u>Treat/Dispose</u></td> </tr> <tr> <td><u>D009</u></td> <td><u>TWI</u></td> <td><u>Treat</u></td> </tr> </tbody> </table> <p>Does the generator provide notification to the treatment or storage facility?</p> <p>Yes <u>X</u> No _____</p>	<u>Waste Code</u>	<u>Facilities</u>	<u>Treat/Store/Dispose</u>	<u>F002, D001, F005</u>	<u>S-K</u>	<u>Treat</u>	<u>K001, F009, D001</u>	<u>PDC/Heritage</u>	<u>Treat/Dispose</u>	<u>D008</u>	<u>PDC</u>	<u>Treat/Dispose</u>	<u>D009</u>	<u>TWI</u>	<u>Treat</u>				
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Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.								
				YES	NO										
			<p>Does the notification contain the following?</p> <p>EPA Hazardous Waste Number(s) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Applicable treatment standards and prohibition levels Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Manifest Number Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Waste Analysis Date (if available) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) B. Does the facility ship any waste that <u>meets</u> the treatment standards to an off-site disposal facility?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (If no, go to C).</p> <p>If yes, identify the waste code and off-site disposal facilities:</p> <table border="0"> <tr> <td><u>Waste Code</u></td> <td><u>Facility</u></td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> </table> <p>Does the facility provide notification and certification to the disposal facility?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	<u>Waste Code</u>	<u>Facility</u>	_____	_____	_____	_____	_____	_____				
<u>Waste Code</u>	<u>Facility</u>														
_____	_____														
_____	_____														
_____	_____														

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Does the notification contain the following:</p> <p>EPA Hazardous Waste Number(s) Yes ____ No ____</p> <p>Applicable treatment standards and prohibition levels Yes ____ No ____</p> <p>Manifest Number Yes ____ No ____</p> <p>Waste Analysis Data (if available) Yes ____ No ____</p> <p>Certification that the waste meets treatment standards (wording in 728.107(a)(2)(ii)) Yes ____ No ____</p> <p>3) C. Is the waste subject to a nationwide variance, case-by-case extension (728.105) or no migration petition (728.106)?</p> <p>Yes ____ No <input checked="" type="checkbox"/> (If no, go to D)</p> <p>If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal?</p> <p>Yes ____ No ____</p> <p>Does the notification contain the following information?</p> <p>EPA Hazardous Waste Number Yes ____ No ____</p> <p>The corresponding treatment standards and all applicable prohibitions Yes ____ No ____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			Manifest Number	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Waste analysis data (if available)	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Date the waste is subject to the prohibitions	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			4) D) Does the facility generate any First, Second or Third Third "soft hammer" waste?				
			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (If No, go to next section)				
			Does the generator provide the following notifi- cation to the receiving facility with each shipment of waste?				
			EPA Hazardous Waste Number	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Applicable prohibition (728.133(f), 728.134(h))	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Manifest Number	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Waste Analysis Data (if available)	Yes <input type="checkbox"/>	No <input type="checkbox"/>		
			Section 728.130 - Waste Specific Prohibitions - Solvent Wastes				
			Section 728.131 - Waste Specific Prohibitions - Dioxin Containing Wastes				
			Section 728.132 - Waste Specific Prohibitions - California List Wastes				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.												
				YES	NO														
			<p>Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?</p> <p>Yes ____ No ____</p> <p>Did the unit meet the Minimum Technology Requirements (MTR) (i.e., double liner, leachate, collection system, groundwater monitoring)?</p> <p>Yes ____ No ____</p> <p>Treatment Using RCRA 264/265 Exempt Units or Processes</p> <p>Is waste treated in a RCRA 264/265 exempt unit(s) (i.e., boilers, furnaces distillation units, wastewater treatment tanks, elementary neutralization, etc.)?</p> <p>Yes <input checked="" type="checkbox"/> No ____</p> <p>List types of waste treatment units and processes:</p> <table border="1"> <thead> <tr> <th>Waste Code</th> <th>Type of Treatment</th> <th>Treatment Units and Processes</th> </tr> </thead> <tbody> <tr> <td>RCRA, F006-9 D008</td> <td>WWT</td> <td>WWT</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p>Are treatment residuals generated from these units?</p> <p>Yes <input checked="" type="checkbox"/> No ____</p>	Waste Code	Type of Treatment	Treatment Units and Processes	RCRA, F006-9 D008	WWT	WWT	_____	_____	_____	_____	_____	_____				
Waste Code	Type of Treatment	Treatment Units and Processes																	
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_____	_____	_____																	
_____	_____	_____																	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>If yes, the residues are subject to the LDR generator requirements.</p> <p>Are these residuals further treated, stored for greater than Section 722.134(a) allows or disposed on-site?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, the TSD checklist must be completed.</p> <p>Section 728.150 - Prohibitions on Storage of Restricted Wastes</p> <p>Are restricted wastes stored (greater than 90 days) on-site?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, are all containers:</p> <p>2) clearly marked to identify their contents and the date entering storage?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Are all tanks:</p> <p>2) clearly marked with a description of their contents, the quantity of wastes received, and date entering storage, or is such information recorded and maintained in the operating record?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p><i>Drums of last treatg SHTs (2007) not listed as to the dates the entered storage</i></p>

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Have wastes been stored for more than one year since applicable LDR regulations went into effect?</p> <p>Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>If yes, can the facility show that such storage is necessary to facilitate proper recovery, treatment or disposal?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>If yes, state how: _____</p> <p>_____</p> <p>_____</p> <p>NOTE: Wastes that are the subject of a no-migration petition, a nationwide variance, a case-by-case extension or meet the treatment standards are not subject to the requirements of Section 728.150.</p> <p>Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:</p> <p>In a facility meeting the TSCA criteria in 40 CFR 761.65(b)?</p> <p>Yes ____ No ____ N/A ____</p> <p>More than one year?</p> <p>Yes ____ No ____ N/A ____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.								
				YES	NO										
			<p>Section 728.107 - Waste Analysis</p> <p>1) Does the facility treat restricted wastes other than in surface impoundments?</p> <p>Yes ____ No <input checked="" type="checkbox"/> (If no, go to 728.104 - Surface Impoundments)</p> <p>Describe the waste codes and treatment processes:</p> <table border="0"> <tr> <td><u>Waste Code</u></td> <td><u>Treatment Processes</u></td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> </table> <p>Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes?</p> <p>Yes ____ No ____</p> <p>Have treatment standards or prohibition levels been met?</p> <p>Yes ____ No ____</p> <p>NOTE: Treatment standards may be expressed as concentrations in the waste (728.107(b)(3)), concentrations in the waste extract (728.107(b)(1)) or combination of both (See Attachment B).</p> <p>2) Does the facility test the treatment residues in accordance with the requirements of Section 728.132(j) (Test methods for California List Wastes)?</p> <p>Yes ____ No ____</p>	<u>Waste Code</u>	<u>Treatment Processes</u>	_____	_____	_____	_____	_____	_____				<p><i>No waste Treated to meet LDR Treatment Standards.</i></p>
<u>Waste Code</u>	<u>Treatment Processes</u>														
_____	_____														
_____	_____														
_____	_____														

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Does the facility ship any waste or treatment residue to an off-site disposal facility?</p> <p>Yes ____ No ____</p> <p>If yes, does the treatment facility provide notification and certification to the disposal facility?</p> <p>Yes ____ No ____</p> <p>4) Does the notification contain the following?</p> <p>EPA Hazardous Waste Number(s) Yes ____ No ____</p> <p>Applicable treatment standards and prohibition levels Yes ____ No ____</p> <p>Manifest Number Yes ____ No ____</p> <p>Waste Analysis Data (if available) Yes ____ No ____</p> <p>5) Did the treatment facility submit a certification with each shipment of waste or treatment residue to the land disposal facility stating that the waste or treatment residue has been treated in compliance with the treatment standards specified in Subpart D and the prohibitions set forth in Section 728.132?</p> <p>Yes ____ No ____</p> <p>NOTE: Treatment standards may be expressed as a technology or concentration in waste or waste extract. Refer to 728.107(b)(5) for the type of certification required.</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>6) If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements of 728.107(a)(1)?</p> <p>Yes ____ No ____</p> <p><u>(NOTE TO ALL INSPECTORS:</u> The May 8, 1990 deadline for the establishment of treatment standards for all Third Third wastes has been extended until August 8, 1990).</p>				